CABOT CORPORATION
USEPA-LDEQ-CABOT CONSENT DECREE
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

a. A description of the construction of the Control Technologies, CEMS, and PM Early Warning Systems required by this Consent Decree, including:

i. If construction is not underway, any available information concerning the construction schedule and the execution of major contracts.

All construction activities have begun. See details below.

ii. If construction is underway, the estimated percent of installation as of the end of the reporting period, the current estimated construction completion date, and a brief description of completion of significant milestones during the reporting period.

Construction efforts began in September 2016 and have continued through June 2019. Construction scope of work efforts completed in this period include:

- FRP absorber tank and tower system construction for the AQCS system (SO_X removal) is 95% complete with additional equipment installation still required to complete the total AQCS system (25% complete).
- Major equipment installation from existing incinerator to AQCS unit is 95% complete.
- The HRSG/SCR equipment that is integral to the HRSG have been installed. Piping, electrical and controls work are 95% complete.
- Ducting from incinerator to HRSG and HRSG to AQCS system has been installed, but are not in operation. Refractory has been installed.
- Consistent with the provisions of the Consent Decree, CEMS equipment systems have been completed and FAT tested, currently residing in an offsite storage facility until required.

The anticipated project schedule for construction activity, including execution of major contracts, is as follows for the Control Systems and CEMS:

- Equipment fabrication – 6/2016 through 2/2018
- Detailed Engineering – Complete
- Phase I Construction – Complete
- Phase II Construction – 10/2019 through 10/2020
- Start - up / Commissioning – 10/2020 through 3/2021
- Compliance – 4 /1/2021

Cabot has executed contracts for the major equipment since December 2015 and has received 100% of all purchased equipment on-site. This includes CEMS and control equipment fabrication packages which were received in October 2017.

Cabot has entered into an agreement with an energy partner, CLECO, who has built and installed a heat recovery steam generator and electricity generator system in conjunction with Cabot's Consent Decree compliance project.

iii. Any information indicating that installation and commencement of operation may be delayed, including the nature and cause of the delay.

Based upon the best information currently available, Cabot has not identified any basis to anticipate any delay in satisfying the installation and construction schedules established under the Consent Decree

iv. Once construction is complete, provide the dates the equipment was placed in service and/or commenced Continuous Operation and the dates of any testing that was performed during the period.

Consistent with the provisions of the Second Amendment of the Consent Decree, construction activity for the control equipment was not completed during the relevant reporting period.

In satisfaction of the relevant terms of the Consent Decree, Cabot installed the equipment associated with the PM Early Warning Systems (PMEWS), established alarm set points, and commenced continuous operation of the system as of the Effective Date of the Consent Decree. The Consent Decree establishes no testing requirements for the system during the reporting period.

b. All information necessary to demonstrate compliance with all applicable Emissions Limits, 30-day Rolling Average Sulfur Content Weight Percent, 365-day Rolling Average Sulfur Content Weight Percent, and other provisions in Sections VI (SO_2 Control Technology, Emissions Limits, and Monitoring Requirements), VII (NO_X Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements)

- *Paragraph 17 - SO_2 Process System Operation, Emissions Limits and Control Technology*

Pursuant to the terms of the Consent Decree and the second amendment, Cabot was not required during the relevant reporting period to demonstrate compliance with any applicable emissions limit, or other provision in Sections VI (SO_2 Control Technology, Emissions Limits, and Monitoring Requirements), VII (NO_X Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements) under the Consent Decree, except as specifically addressed herein.

- *Paragraph 18 - WGS Design Specifications*

Pursuant to the terms of the Consent Decree, Cabot submitted the WGS Design Specifications to the EPA on September 10, 2015 and provided follow-up information on November 10, 2015.

- *Paragraph 19 - SO_2 Alternative Equivalent Pollution Control Technology*

Pursuant to the terms of the Consent Decree, Cabot has not requested an Alternative Equivalent Pollution Control Technology for SO_2.

- *Paragraph 20 - SO_2 Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

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- *Paragraph 23 - NO_X Emissions Limits Applicable to Heat Load Operation, Startup, and Shutdown*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 24 - Heat Load Operation, Startup, and Shutdown Compliance Calculation*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 25 - Alternative Heat Load Operation, Startup, and Compliance Calculation*

  Pursuant to the terms of the Consent Decree, Cabot has not requested an Alternative Heat Load Operation, Startup, and Compliance Calculation for NO_X.

- *Paragraph 26 - NO_X Process System Operation Emissions Limits and Control Technology SCR Design Specifications*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 27 - SCR Design Specifications*

  Pursuant to the terms of the Consent Decree, Cabot submitted the WGS Design Specifications to the EPA on September 10, 2015 and provided follow-up information on November 10, 2015.

- *Paragraph 28 - NO_X Alternative Equivalent Pollution Control Technology*

  Pursuant to the terms of the Consent Decree, Cabot has not requested an Alternative Equivalent Pollution Control Technology for NO_X.

- *Paragraph 29 - NO_X Monitoring Requirements*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 30 - PM Control Technology and Emissions Limits*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until 180 days after April 1, 2021, or September 29, 2021.

- *Paragraph 31 - PM Stack Testing*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required to begin until 180 days after April 1, 2021, or September 29, 2021.

- *Paragraph 32 and Appendix B - Other PM Control Requirements*

During the reporting period, Cabot achieved and maintained compliance with the requirements of Paragraph 32 and Appendix B the Consent Decree relative to particulate matter ("PM") control requirements. More specifically, for each PM emissions equipment unit:

- Cabot employed the required PM Reduction Mechanism and Method for Managing PM Emissions specified in Appendix B of the Consent Decree.
- Cabot completed the relevant daily visual assessments and maintained a record of the results of each such assessment.
- Cabot developed and maintained a record of the results of each of the required daily visual assessments and associated Method 9 observations, when applicable.

- *Paragraph 33 and Appendix C - Particulate Emissions Best Management Practices Control Plan*

  Cabot implemented the Particulate Emissions Best Management Practices Control Plan set forth in Appendix C of the Consent Decree, to the extent required during the reporting period.

- *Paragraph 34 and Appendix D - PM Early Warning System*

  Cabot maintained compliance with applicable requirements of the Consent Decree related to the PM Early Warning System throughout the reporting period. During the reporting period, Cabot operated each PM Early Warning System at all times of Heat Load Operation and Process System Operation, except during system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments of the applicable system.

  During the reporting period, Cabot achieved a data availability of greater than 95% based on a quarterly average of the operating time of the emission unit or activity being monitored, and therefore, achieved full compliance with the minimum degree of availability requirements of the Consent Decree.

  In addition, in response to any alarm triggered during the reporting period for any PM Early Warning System at the facility, Cabot investigated the cause of the alarm as expeditiously as practicable and performed the required sequence of tasks to respond to the alarm.

  On each Operating Day in this reporting period, Cabot conducted a visual review of the recorded data for each PM Early Warning System to identify trends in relative PM emissions.

  Cabot also conducted routine maintenance during the reporting period in accordance with manufacturer's recommendations as addressed within the provisions in Paragraphs D.8a and D.8b of the Consent Decree.

d. All CEMS data collected for each Process System, from the time any Emissions Limit in Sections VI (SO_2 Control Technology, Emissions Limits, and Monitoring Requirements) and VII (NO_x Control Technology, Emissions Limits, and Monitoring Requirements) is exceeded until compliance is achieved, and an explanation of any periods of downtime of such CEMS.

- *Paragraph 20 - SO_2 Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 29 - NO_X Monitoring Requirements*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

e. A copy of the protocol for any PM stack tests performed in accordance with the requirements of Paragraph 31

- *Paragraph 31 - PM Stack Testing*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required to begin until 180 days after April 1, 2021, or September 29, 2021.

f. All PM Early Warning System data collected, from the time a PM Early Warning System alarm is triggered until the PM Early Warning System data have returned to normal operating ranges, below levels triggering an alarm condition, and an explanation of any periods of PM Early Warning System downtime

Data collected for each event in which a PM Early Warning System alarm was triggered during this reporting period is presented in **Attachment 1**.

A summary of the periods of PM Early Warning System downtime, providing the required explanation for each such period, is presented in **Attachment 2**.

g. A description of any violation of the requirements of this Consent Decree, including any violation resulting from Malfunctions, any exceedance of an Emissions Limit, any exceedance of a 30-day rolling Average Sulfur Content Weight Percent or 365-day Rolling Average Weight Percent, or any failure to install, commence operation or Continuously Operate and Control Technology or any PM Early Warning System, which includes:

i. the date and duration of, and the quantity of any emissions related to, the violation;

ii. a full explanation of the primary root cause and any other significant contributing cause(s) of the violation;

iii. a root cause analysis of all reasonable interim and long-term remedial steps or corrective actions, including all design, operation, and maintenance changes consistent with good engineering practices, if any, that could be taken to reduce or eliminate the probability of recurrence of such violation, and, if not already completed, a schedule for its (their) implementation, or, if Defendant concludes that remedial steps or corrective actions should not be conducted, the basis for that conclusion.

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

h. If no violations occurred during a reporting period, a statement that no violations occurred:

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

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i. A description of the status of any permit applications and any proposed SIP revisions required under this Consent Decree

Cabot applied for and obtained an Authorization to Construct and Approval to Operate on December 28, 2015 (Agency Interest Number 19901) from the Louisiana Department of Environmental Quality for the installation of the pollution control equipment required by the Consent Decree.

j. A summary of all actions undertaken and Project Dollars expended during the reporting period, as well as any cumulative Project Dollars expended, and the estimated environmental benefits achieved to date in satisfaction of the requirements of Section V (Environmental Mitigation) and Appendix A.

The mitigation project was completed on February 27, 2017. Cabot filed the completion report with the EPA on March 9, 2017. With this submittal, all provisions of the Environmental Mitigation have been completed.

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ATTACHMENT 1

PM EARLY WARNING SYSTEM DATA COLLECTED DURING HIGH PM EMISSIONS EVENTS

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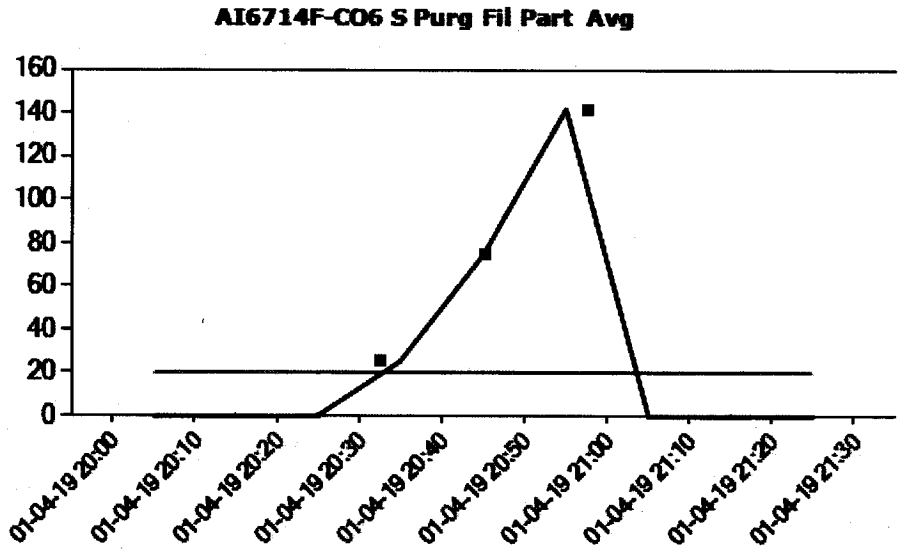
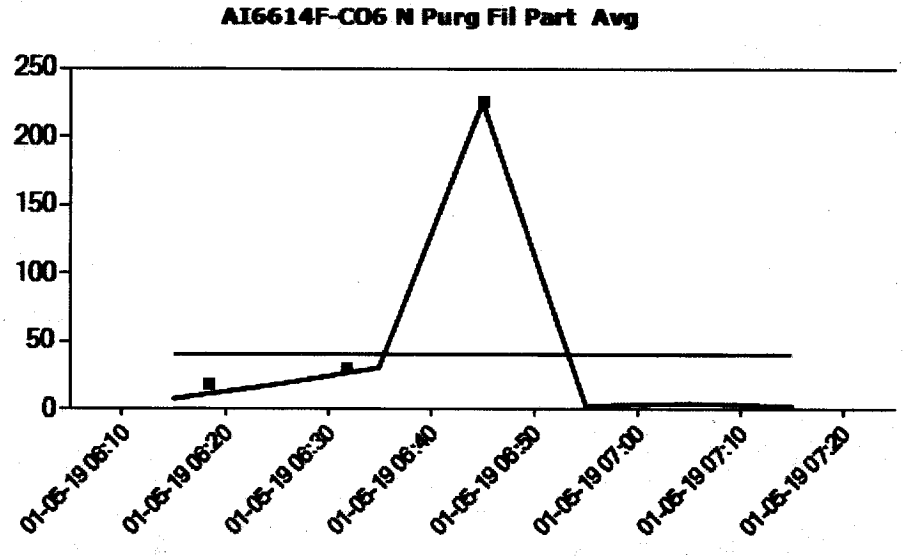
CO-6 S Purge Filter, 1/4/2019, 20:35 to 21:05; Pulled and cleaned the probe



CO-6 N Purge Filter, 1/5/2019, 6:45- 6:55; Pulled and cleaned the probe



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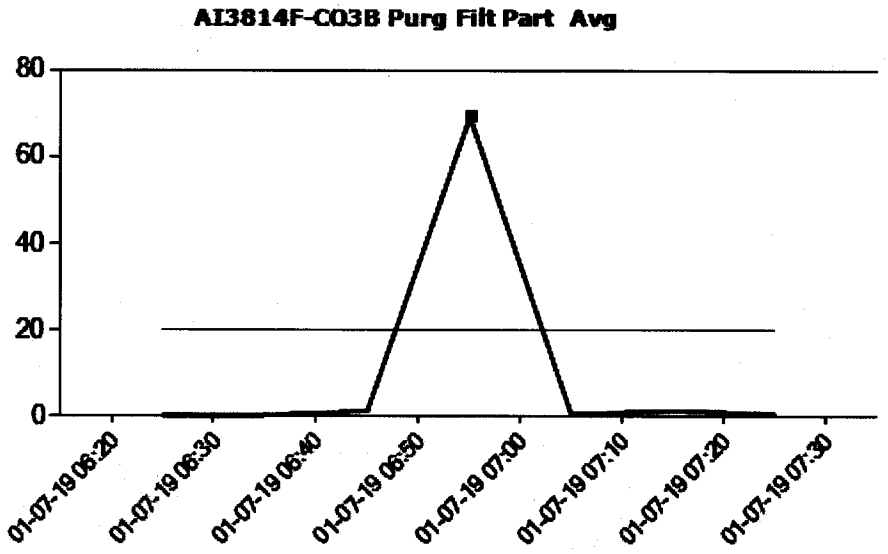
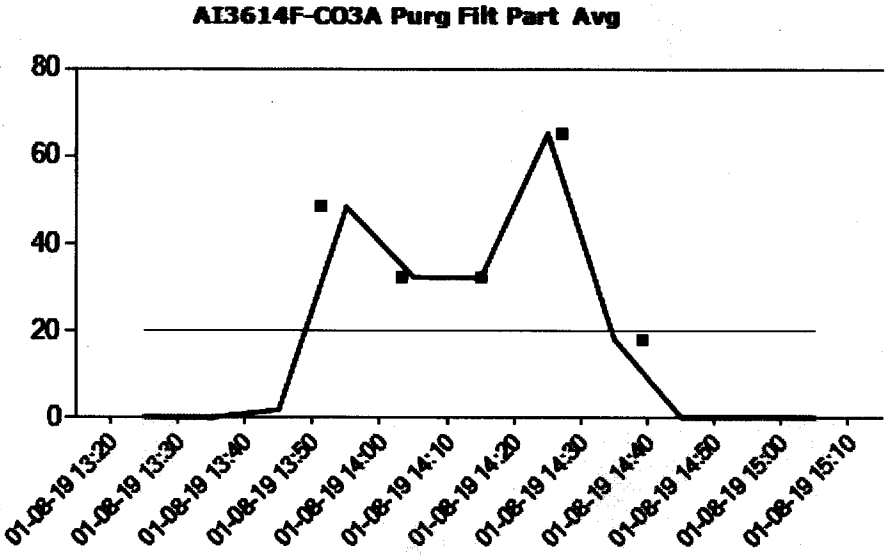
CO-3B Purge Filter, 1/7/2019 6:55 – 7:05; Unit start-up



CO-3A Purge Filter, 1/8/2019, 13:55 – 14:35; Unit start-up, pulled and cleaned the probe, moisture on probe



CANAL PLANT

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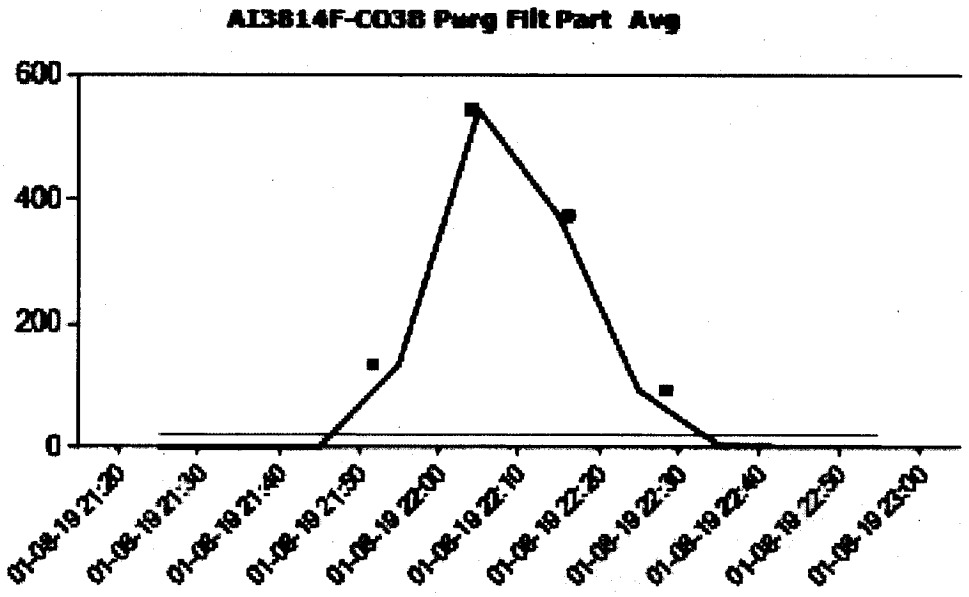
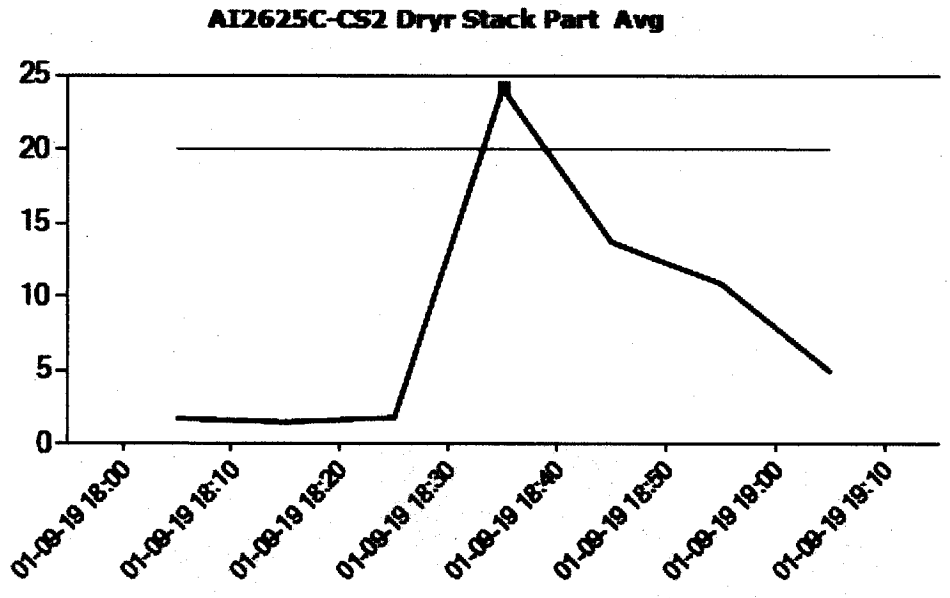
CO-3B Purge Filter, 1/8/2019, 21:55 – 22:35; Unit start-up



CS-2 Dryer, 1/9/2019, 18:35 – 18:45; Sudden spike



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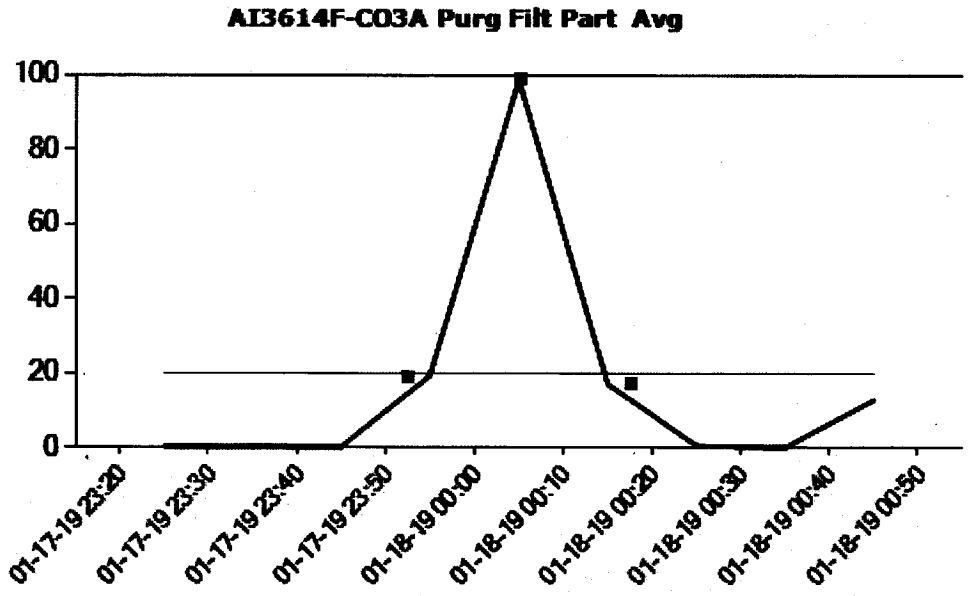
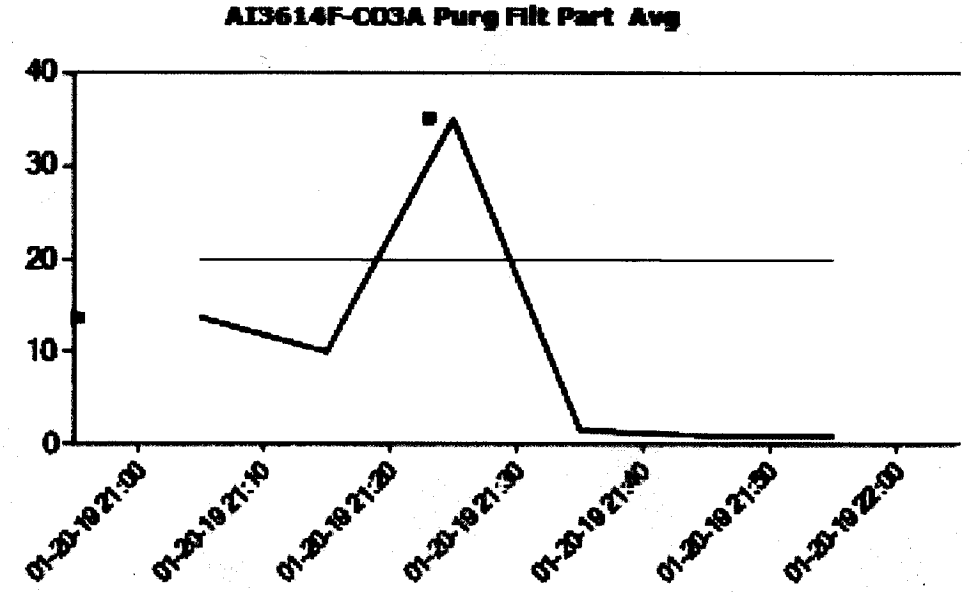
CO-3A Purge Filter, 1-18-2019, 00:05 – 00:15; Unit start-up



CO-3A Purge Filter, 1/20/2019, 21:25 – 21:35; Pulled and cleaned the probe



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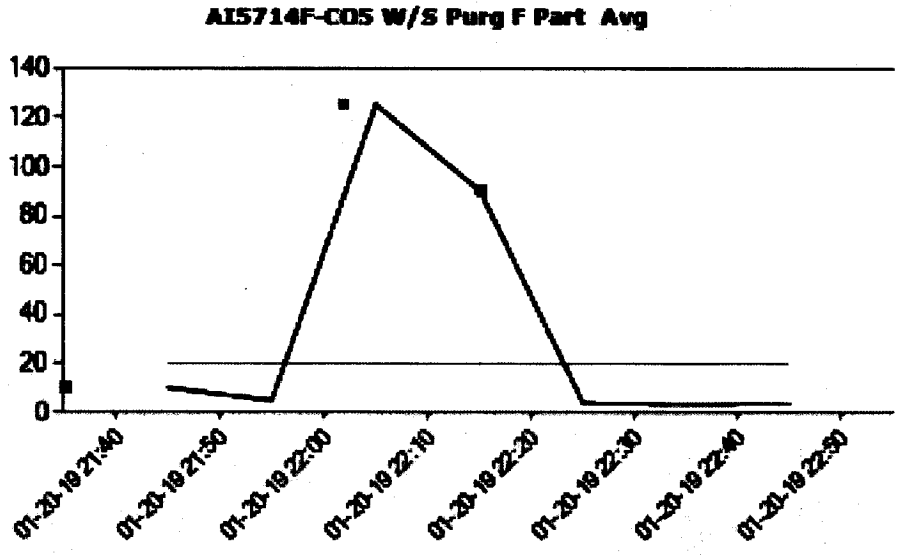
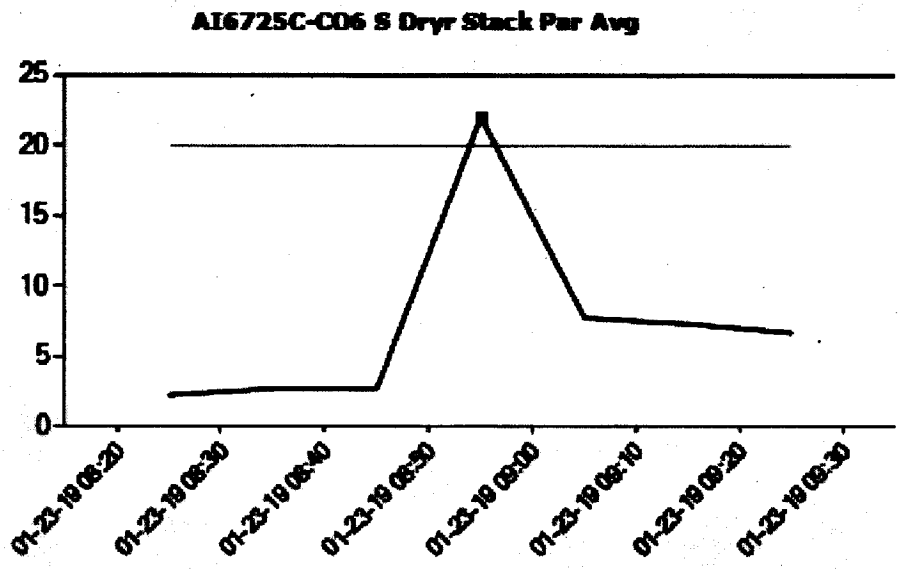
CO-5 W/S Purge Filter, 1/20/2019, 22:05 – 22:25; Pulled and cleaned the probe, moisture and build-up on the probe



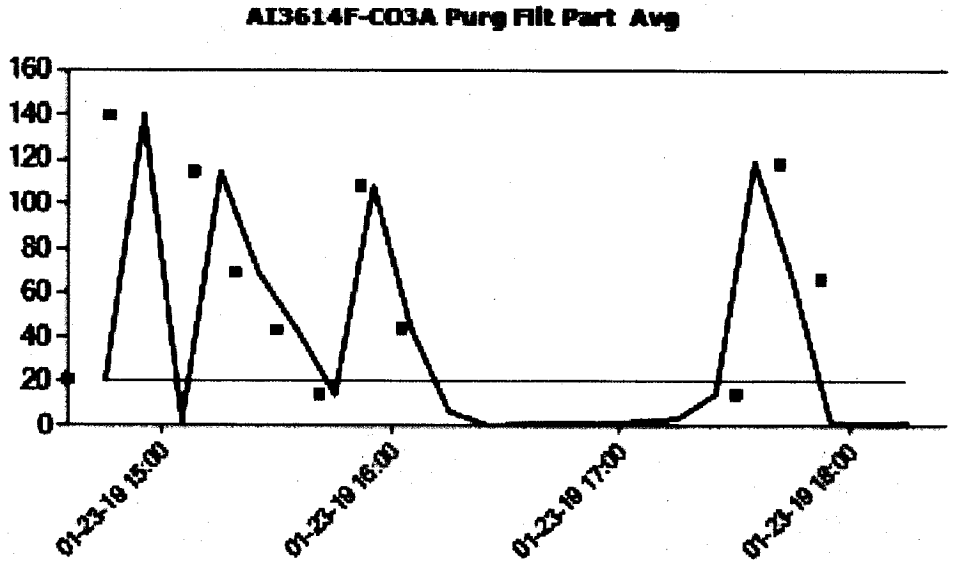
CO-6 S Dryer, 1/23/2019, 8:55 – 9:05; Sudden spike



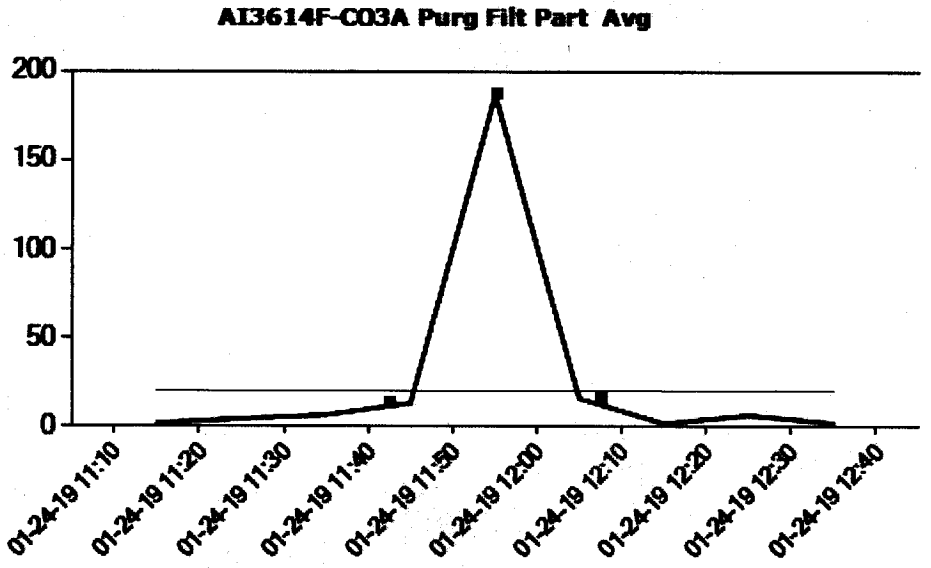
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3A Purge Filter, 1/23/2019, 14:45 – 17:55; Unit start-up, pulled and cleaned the probe



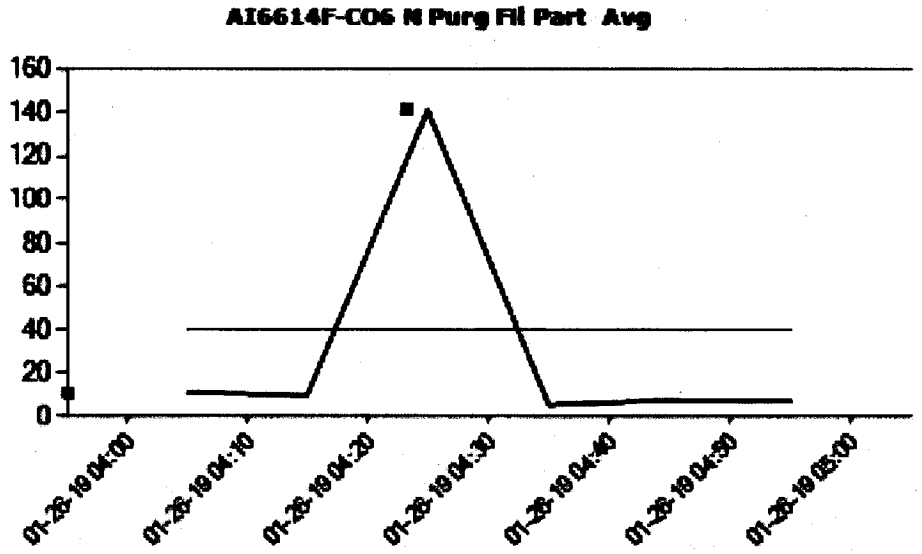
CO-3A Purge Filter, 1/24/2019, 11:55 – 12:05, Pulled and cleaned probe



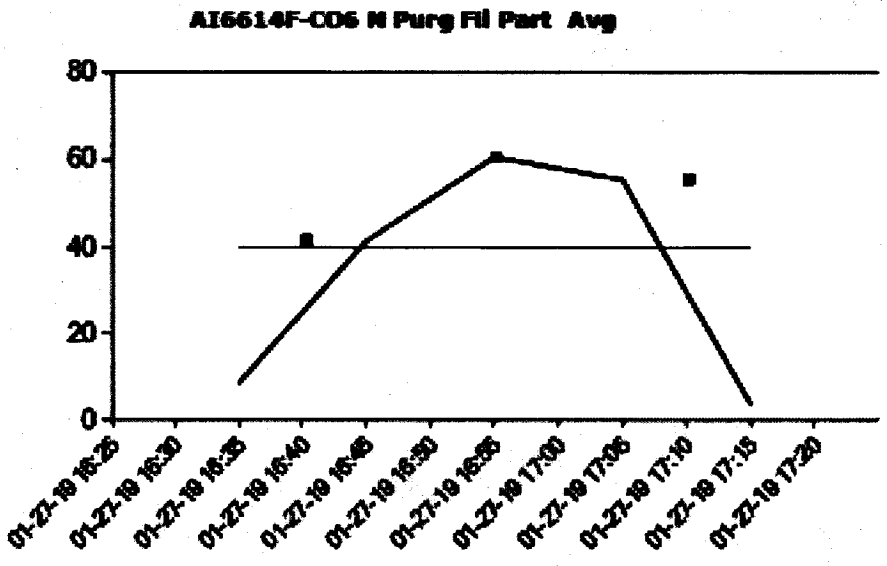
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 N Purge Filter, 1/26/2019, 4:25 – 4:35; Pulled and cleaned the probe



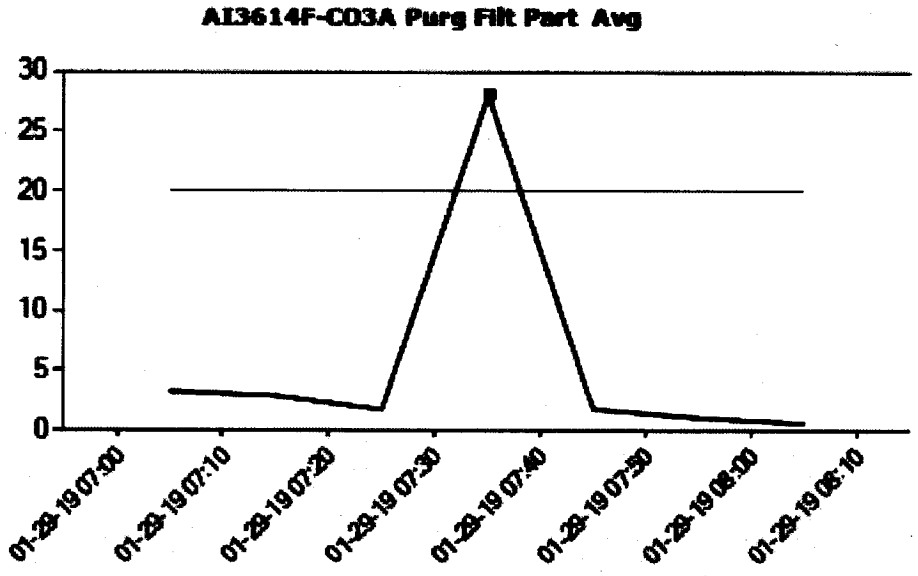
CO-6 N Purge Filter, 1/27/2019, 16:45 – 17:05; Suspected moisture on the probe, pulled and cleaned the probe



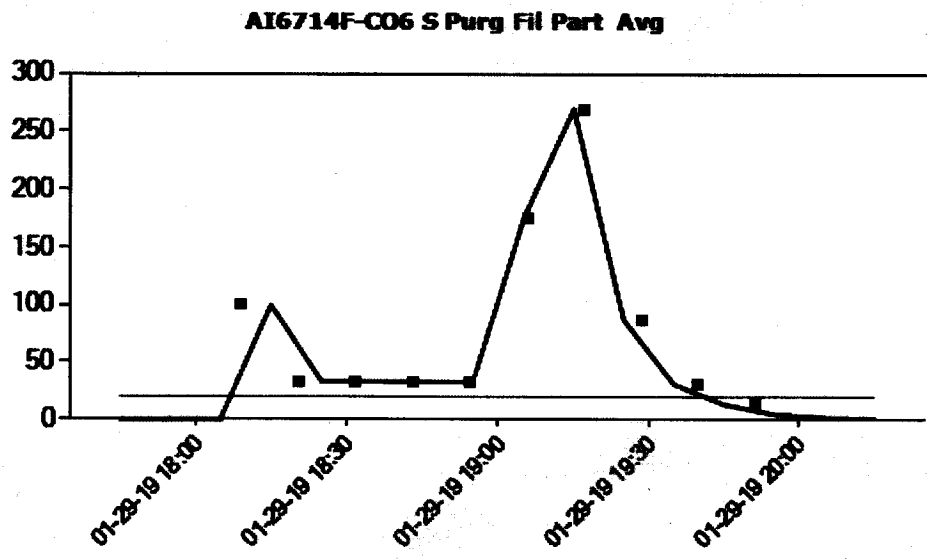
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3A Purge Filter, 1/29/2019, 7:35 – 7:45; Sudden spike



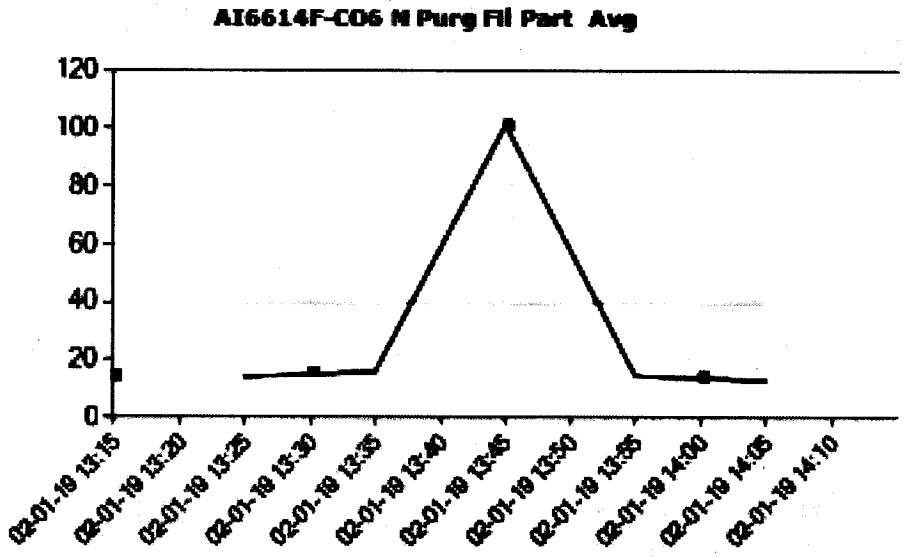
CO-6 S Purge Filter, 1/29/2019, 18:15 – 19:45; Unit start-up



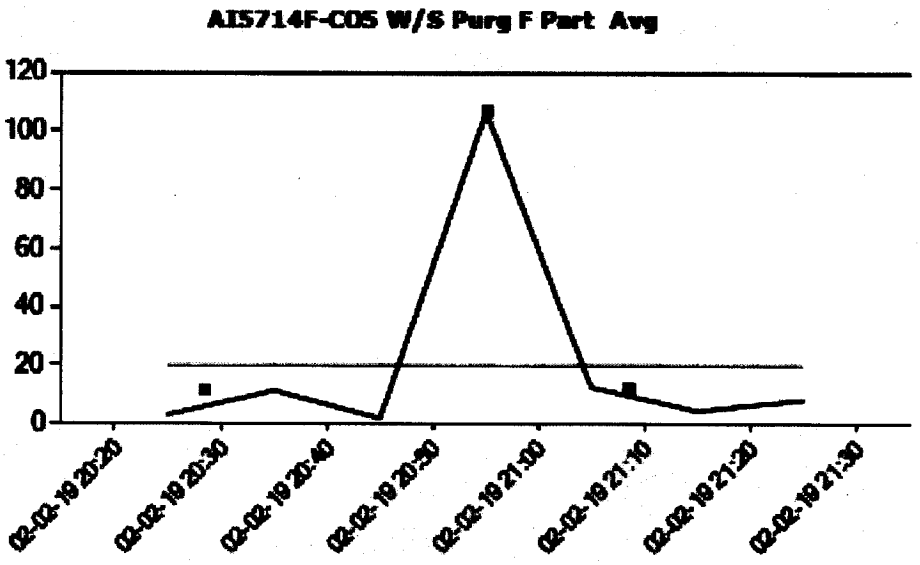
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 N Purge Filter, 2/1/2019, 13:45 – 13:55; Unit start-up, pulled and cleaned the probe



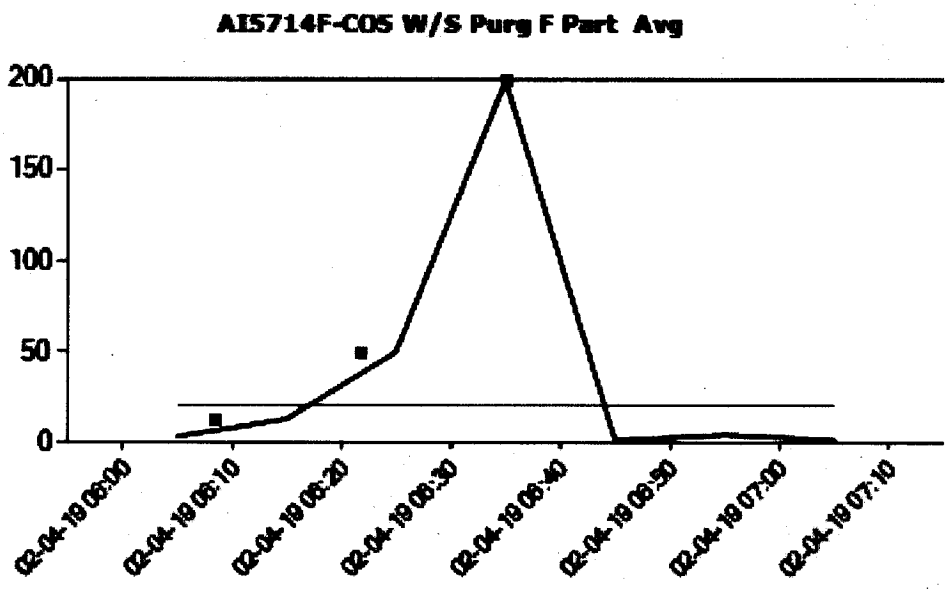
CO-5 W/S Purge Filter, 2/2/2019, 20:55 – 21:05; Pulled and cleaned the probe



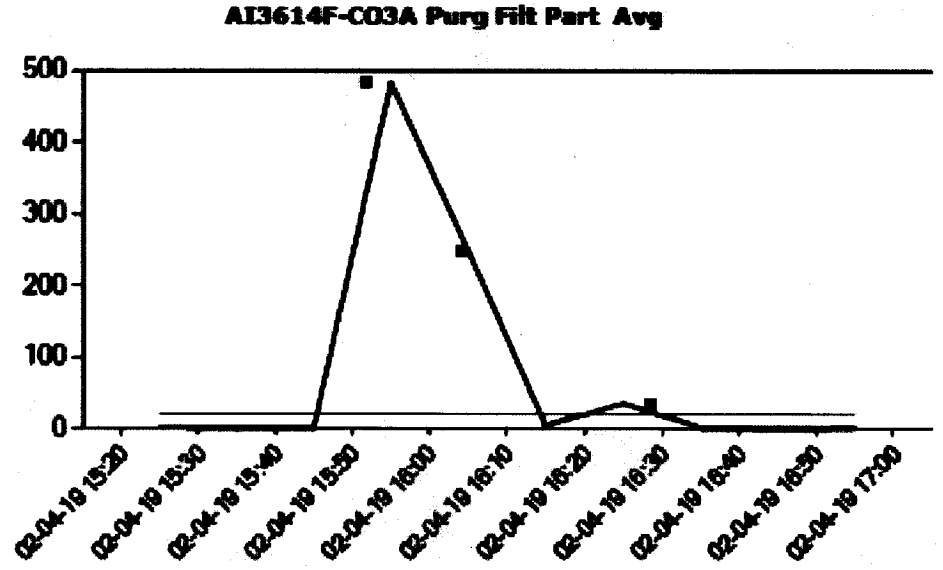
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 2/4/2019, 6:25 – 6:45; Filter leaking, pulled and cleaned probe



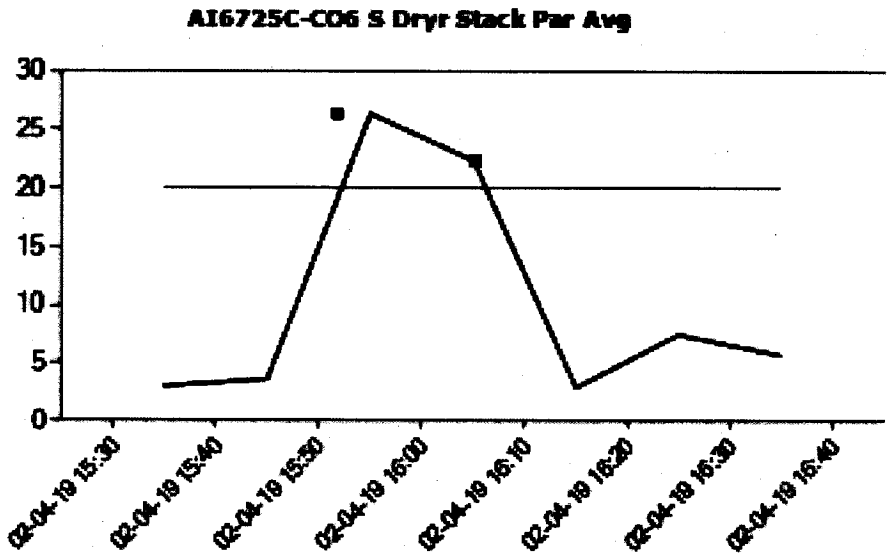
CO-3A Purge filter, 2/4/2019, 15:55 – 16:35; Heavy rain event



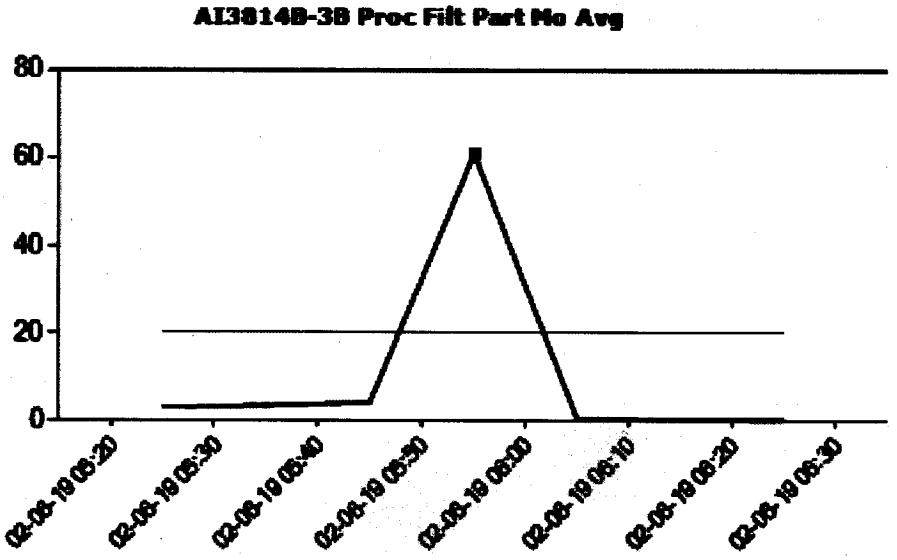
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 S Dryer, 2/4/2019, 15:55 – 16:15; Heavy rain event



CO-3B Process Filter, 2/6/2019, 5:55 – 6:05; Filter leaking, pulled and cleaned probe



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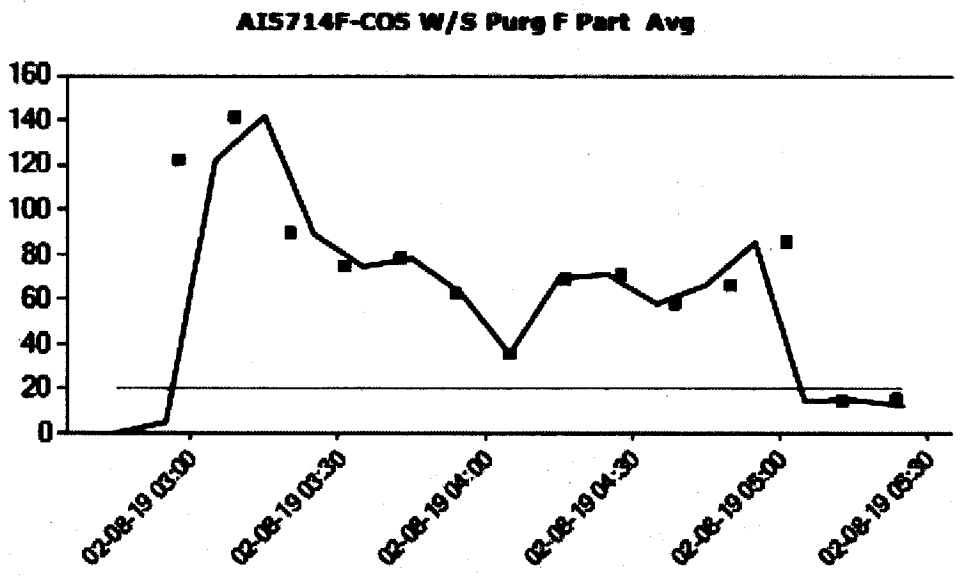
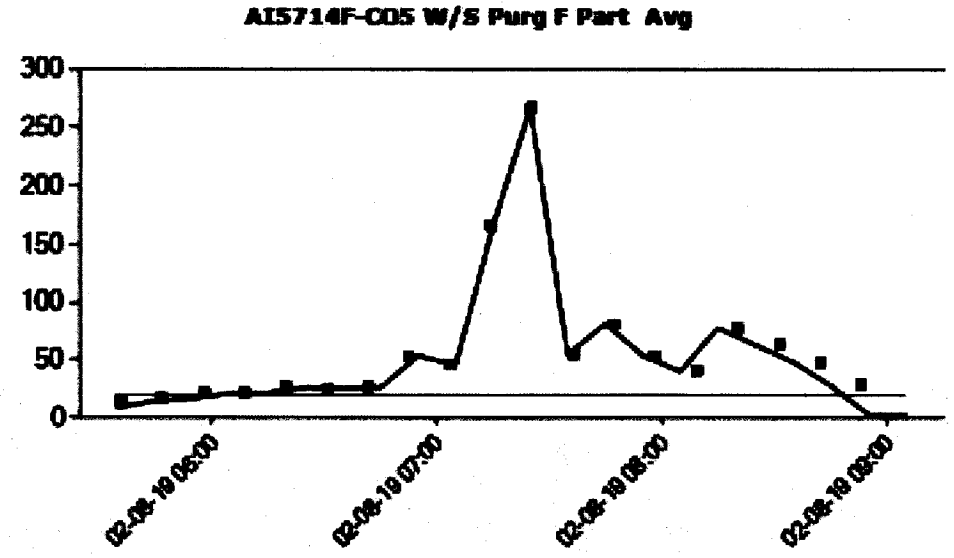
REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 2/8/2019, 3:05 – 5:05; Spike in readings, pulled and cleaned the probe



CO-5 W/S Purge Filter, 2/8/2019, 6:05 – 8:55; Filter leaking, plugged filter, pulled and cleaned probe



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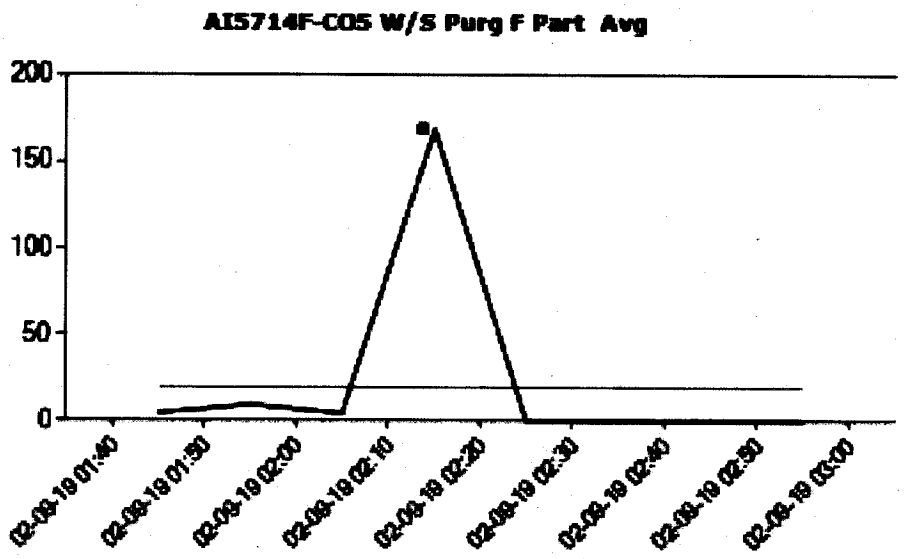
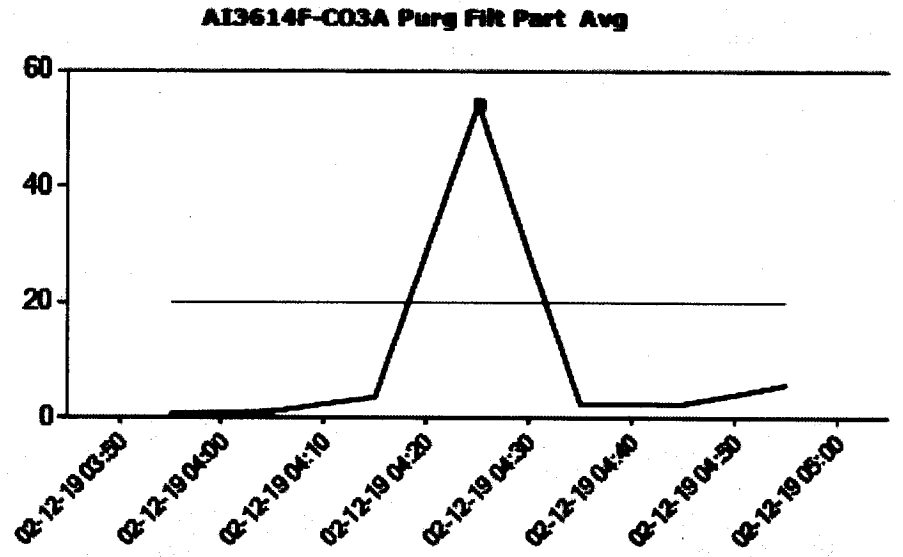
REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 2/9/2019, 2:15 – 2:25; Pulled and cleaned the probe



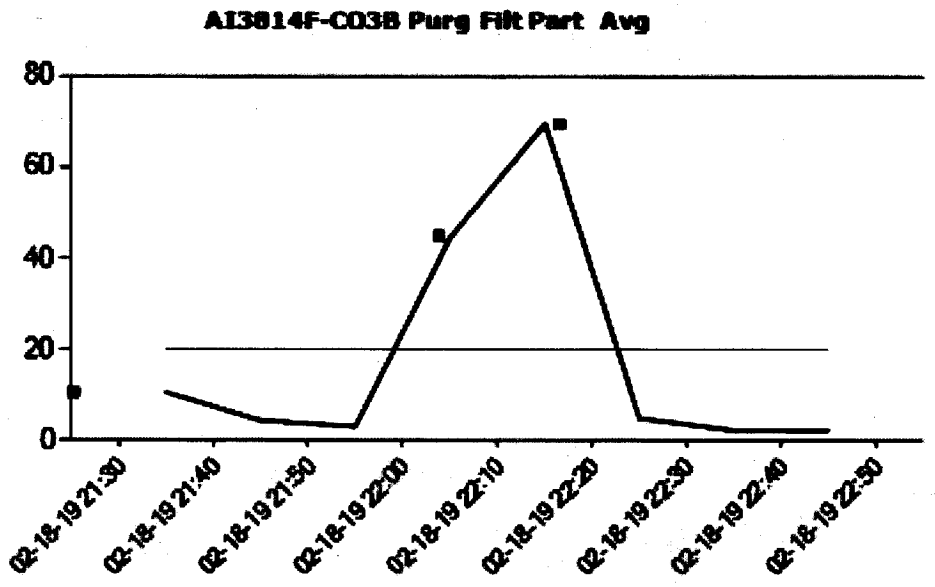
CO-3A Purge Filter, 2/12/2019, 4:25 – 4:35; Heavy rain event



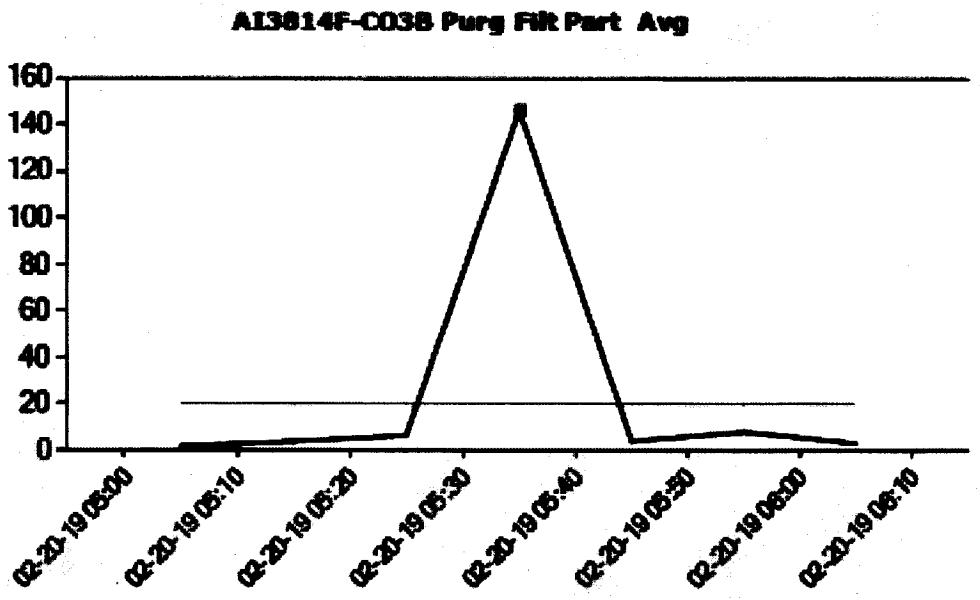
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 2/18/2019, 22:05 – 22:25; Pulled and cleaned the probe



CO-3B Purge Filter, 2/20/2019, 5:35 – 5:45; Filter leaking, plugged filter, pulled and cleaned probe



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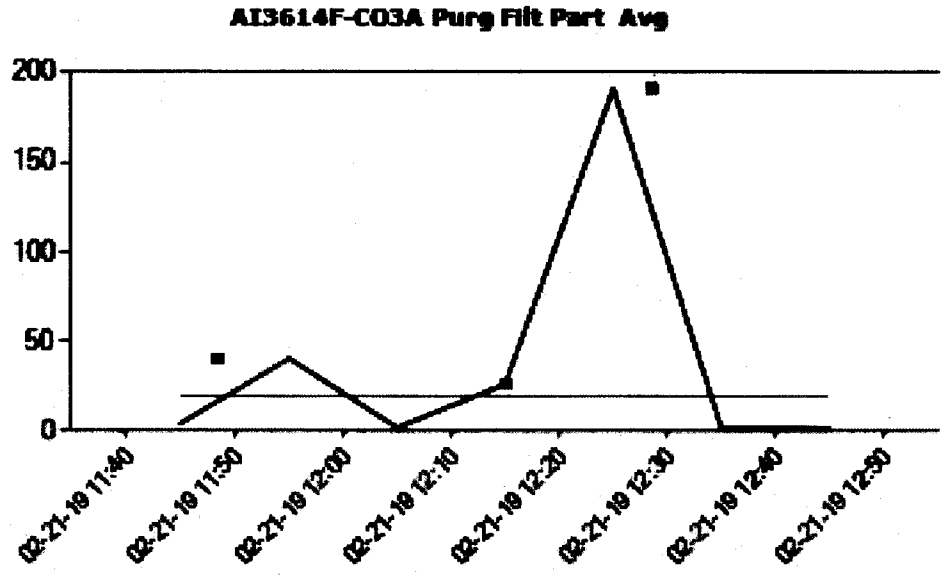
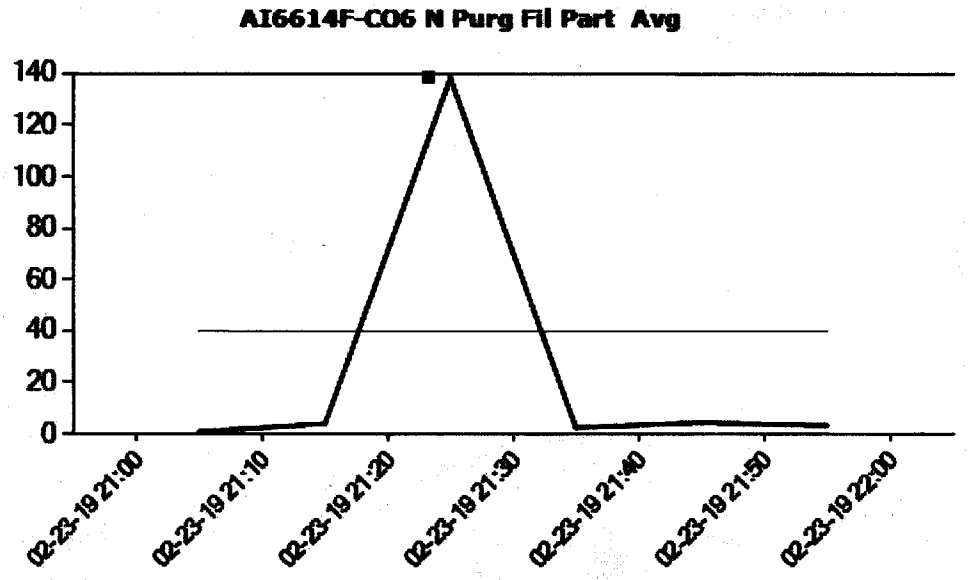
CO-3A Purge Filter, 2/21/2019, 11:55 – 12:35; Pulled and cleaned probe



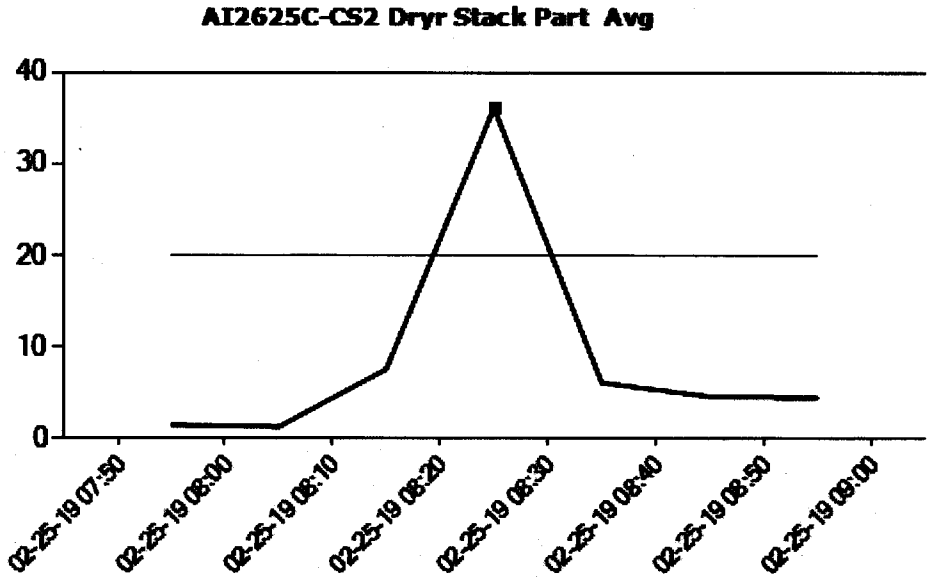
CO-6 N Purge Filter, 2/23/2019, 21:25 – 21:35; Unit start-up



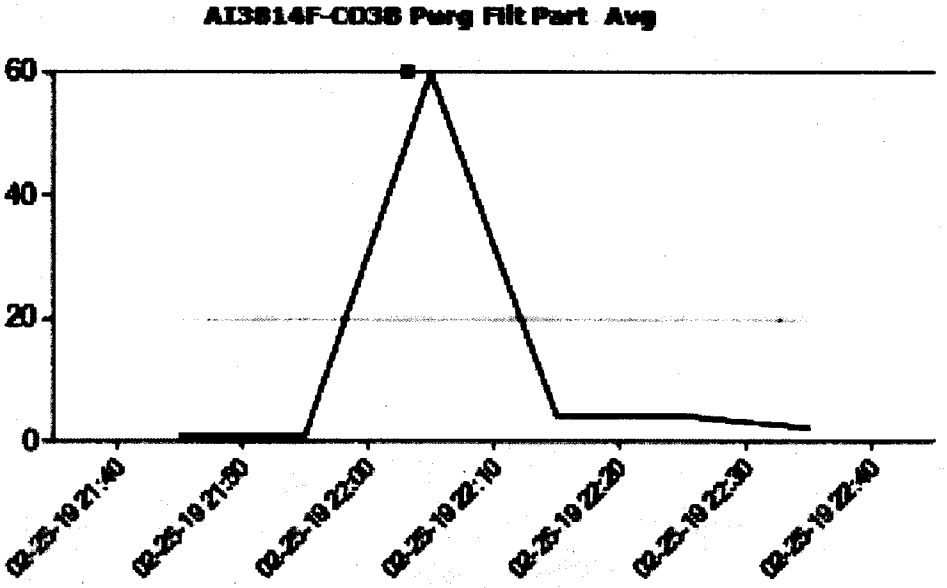
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-2 Dryer, 2/25/2019, 8:25 – 8:35, Unit start-up



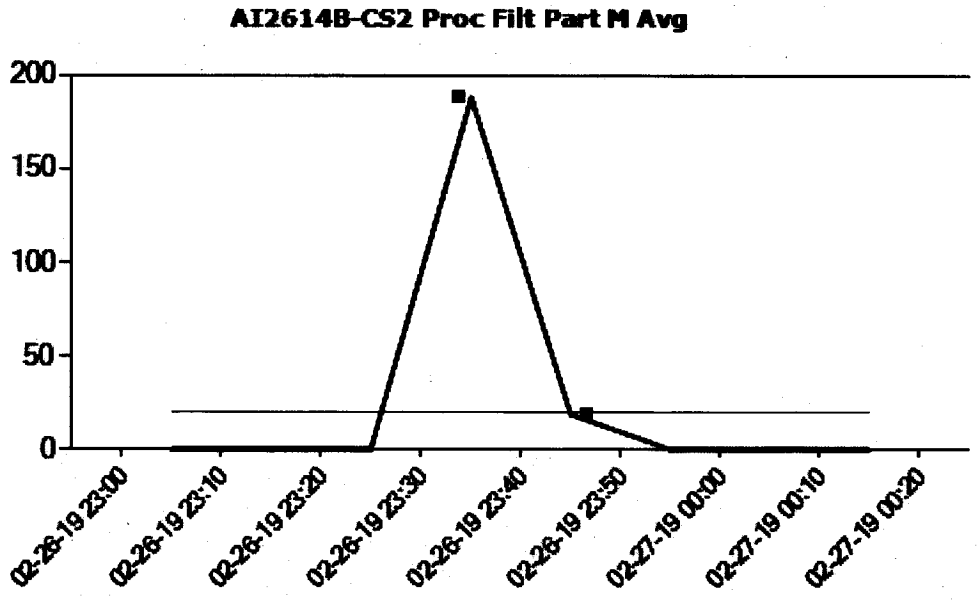
CO-3B Purge Filter, 2/25/2019, 22:05 – 22:15; Pulled and cleaned the probe



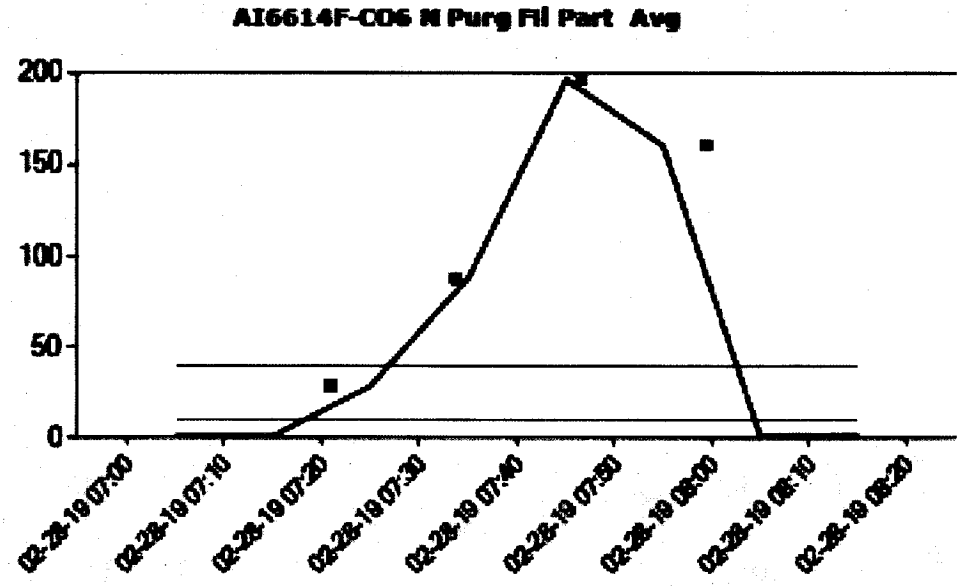
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-2 Process Filter, 2/26/2019, 23:35 – 23:45; Heavy rain event



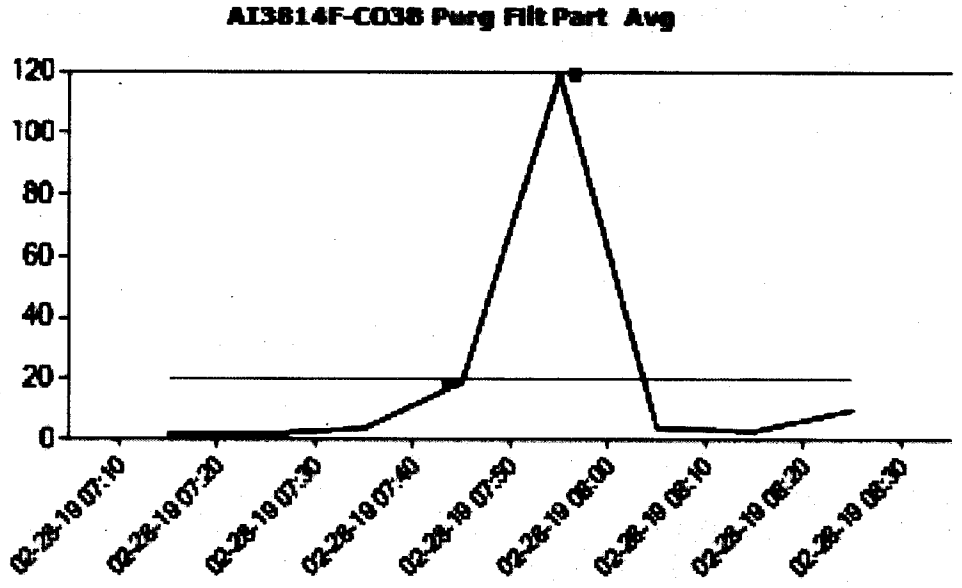
CO-6 N Purge Filter, 2/28/2019, 7:35 – 8:05; Pulled and cleaned the probe, moisture and build-up on the probe



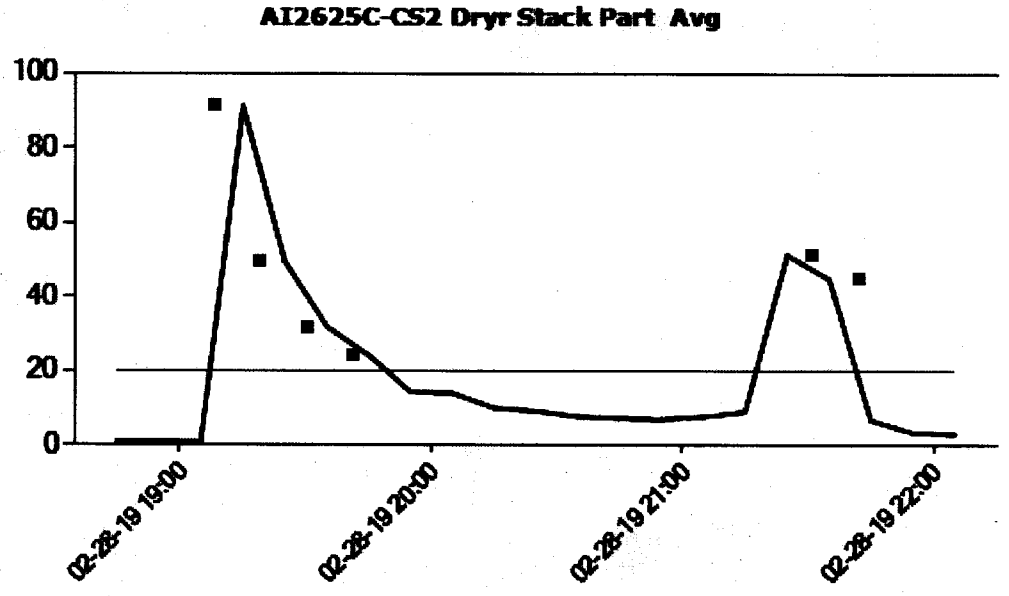
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 2/28/2019, 7:55 – 8:05; Pulled and cleaned the probe



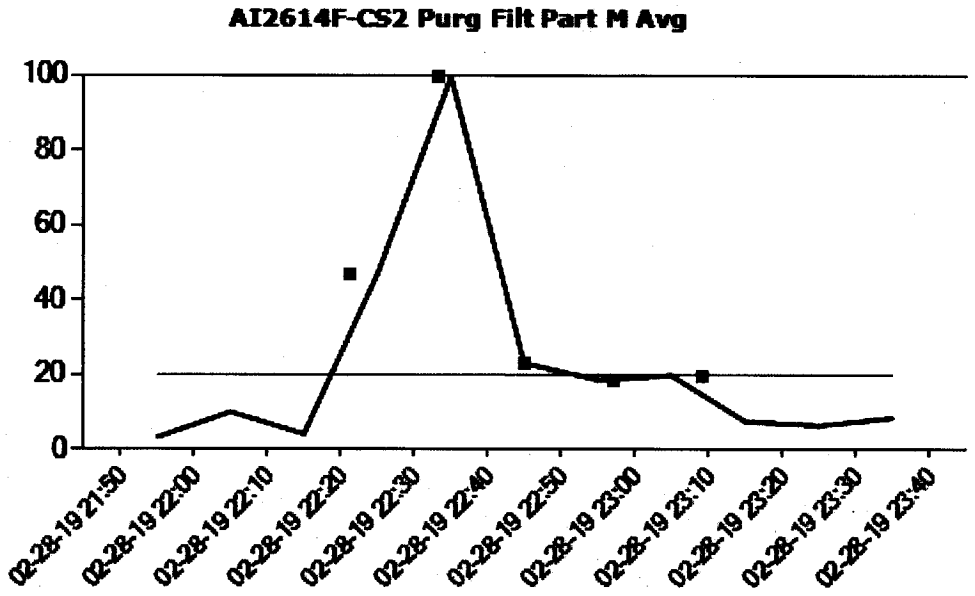
CS-2 Dryer, 2/28/2019, 19:15 – 21:45; Unit start-up, rain event



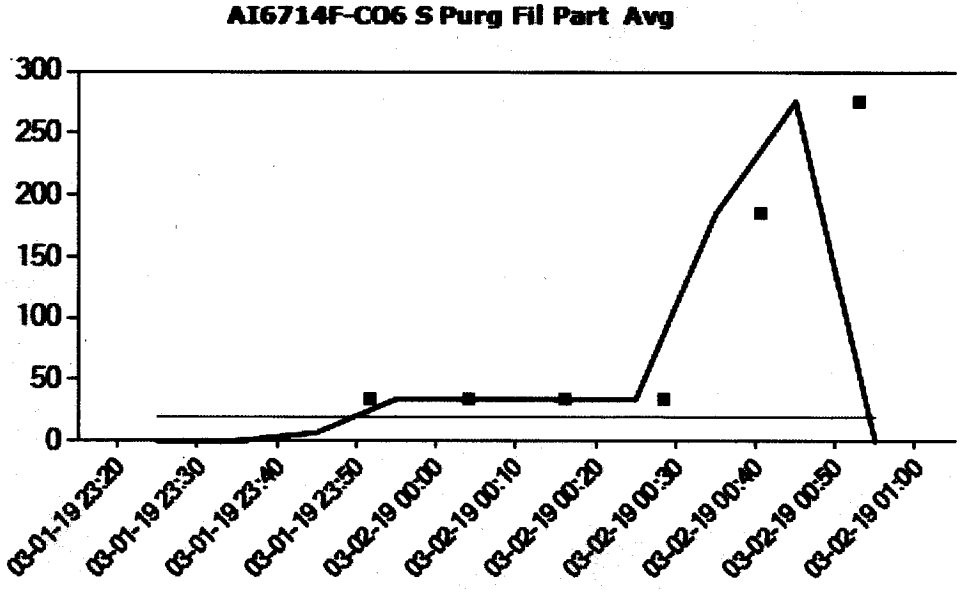
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-2 Purge Filter, 2/28/2019, 22:25 – 23:15; Unit start-up



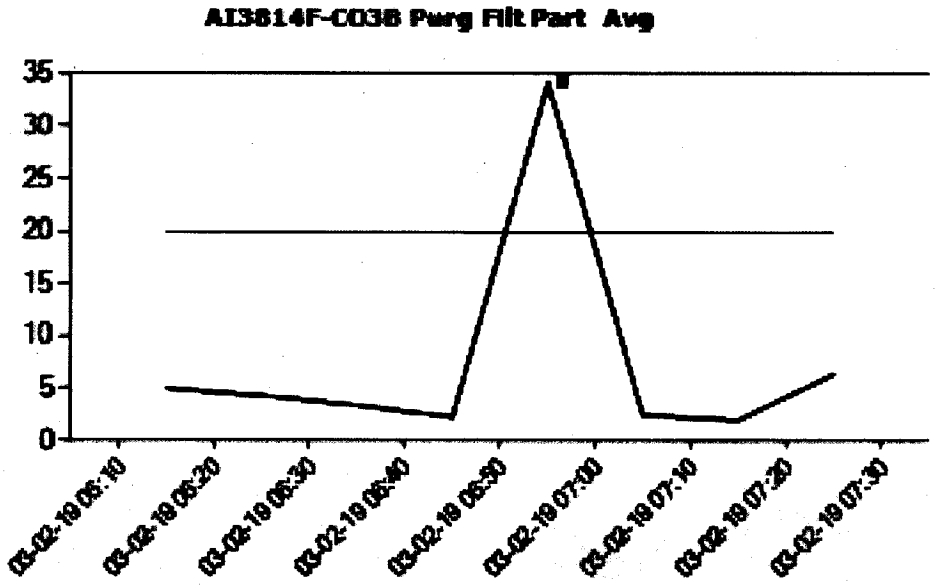
CO-6 S Purge Filter, 3/1/2019 – 3/2/2019, 23:55 – 00:55; South side unit start-up, pulled and cleaned the probe



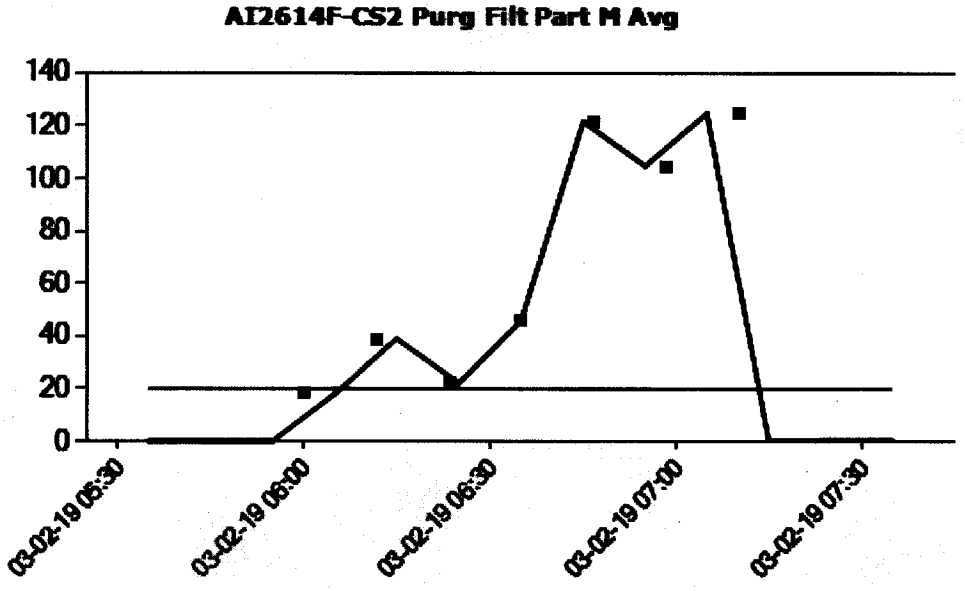
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 3/2/2019, 6:55 – 7:05; Pulled and cleaned the probe



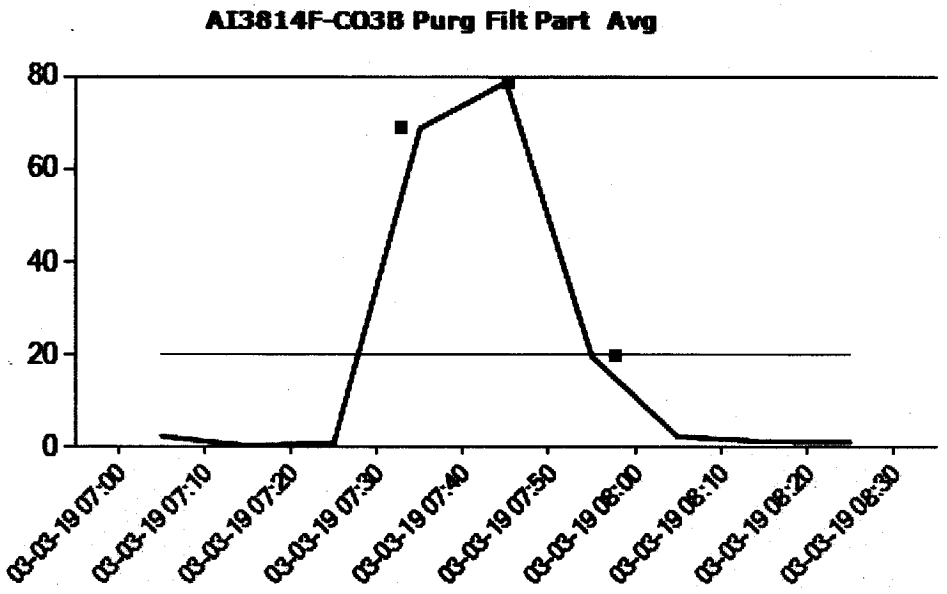
CS-2 Purge Filter, 3/2/2019, 6:15 – 7:15; Pulled and cleaned the probe; moisture and build-up on the probe



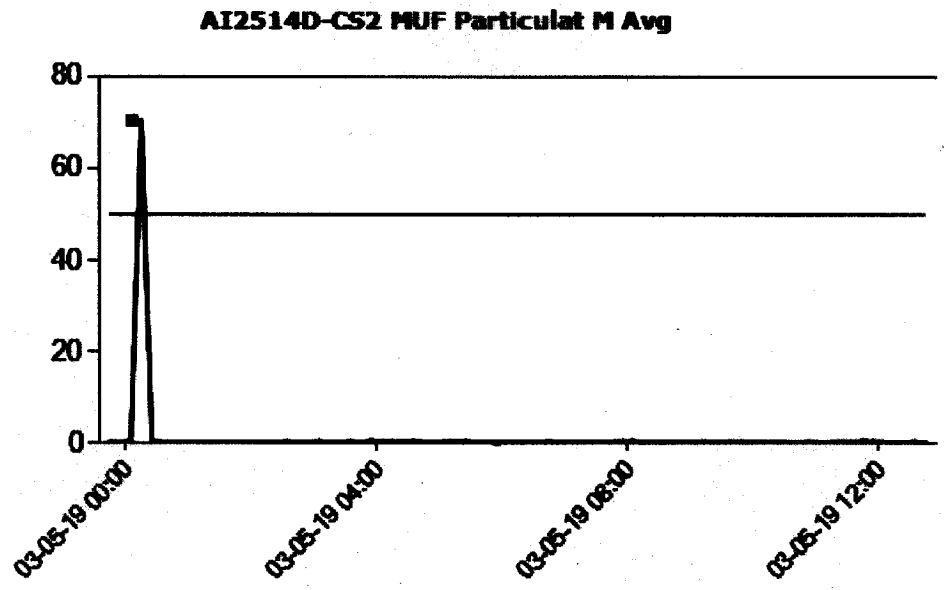
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 3/3/2019, 7:35 – 8:05; Unit start-up



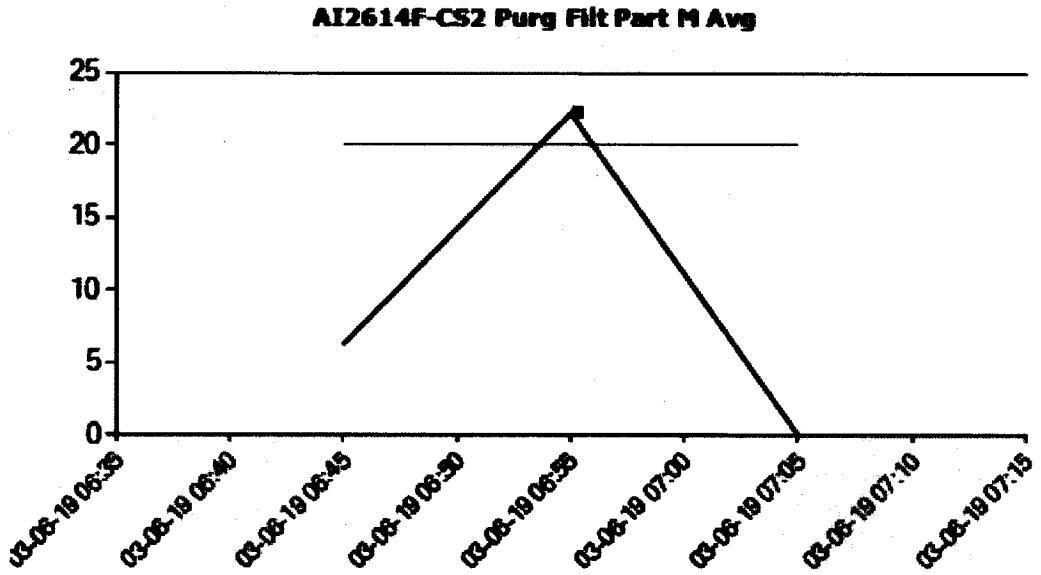
CS-2 MUF, 3/5/2019, 00:15 – 00:25; Sudden spike



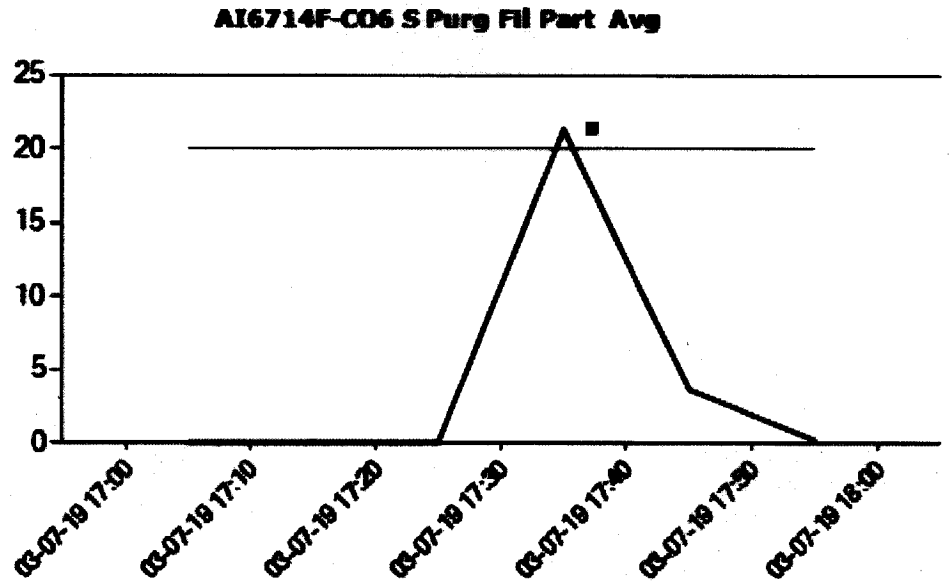
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-2 Purge Filter, 3/6/2019, 6:55 – 7:05; Unit start-up



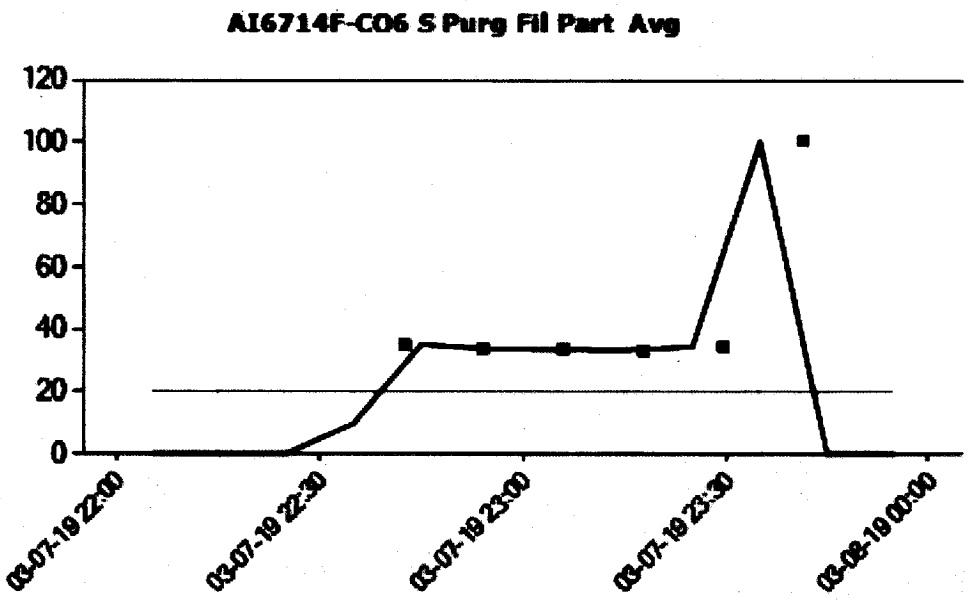
CO-6 S Purge Filter, 3/7/2019, 17:35 – 17:45; Start-up of the purge filter, suspected moisture



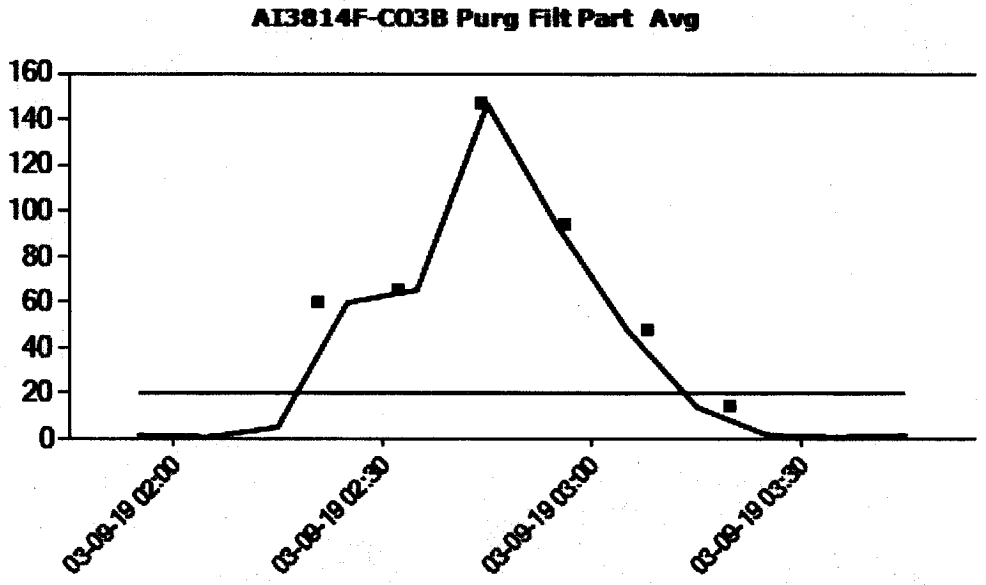
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 S Purge Filter, 3/7/2019, 22:45 – 23:45; Start-up of the reactor; pulled and cleaned the probe, moisture on the probe



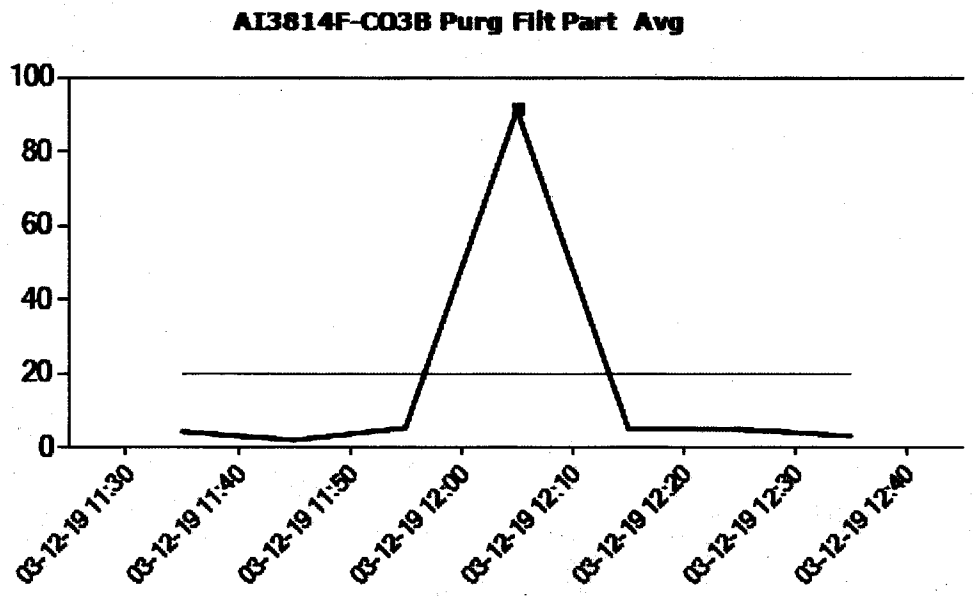
CO-3B Purge Filter, 3/9/2019, 2:25 – 3:15; Unit start-up



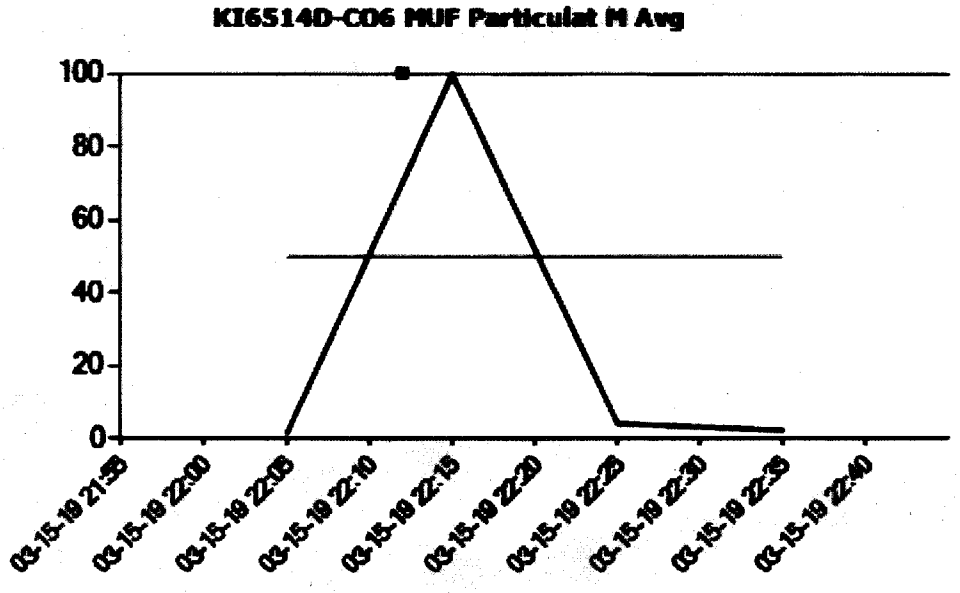
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 3/12/2019, 12:05 – 12:15; Pulled and cleaned probe



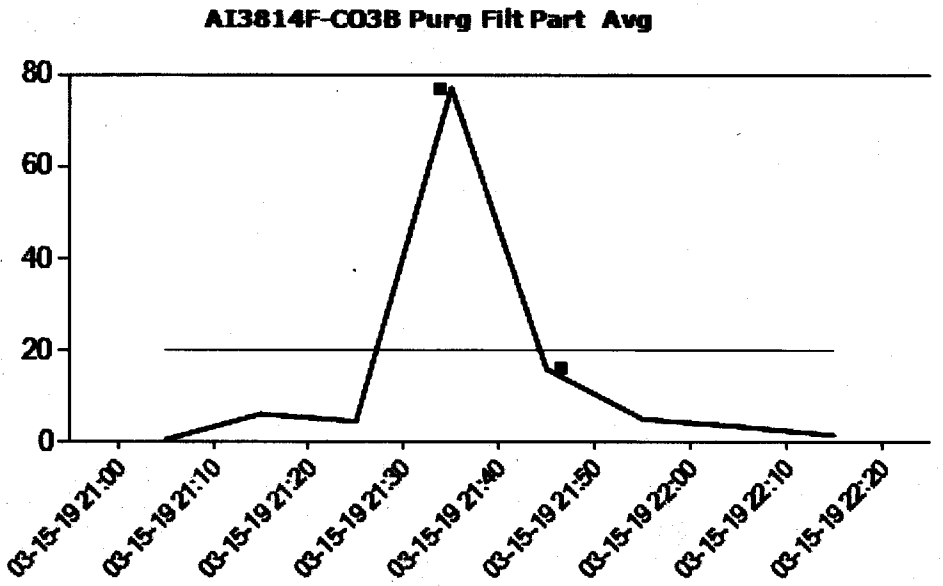
CO-6 MUF, 3/15/2019, 22:15 – 22:25; Pulled and cleaned probe



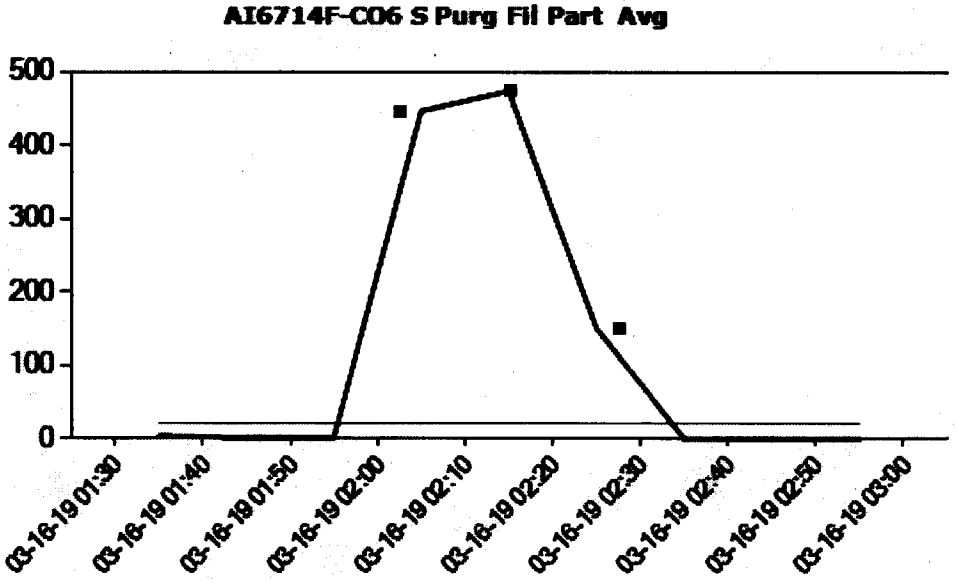
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 3/15/2019, 21:35 – 21:45; Unit start-up



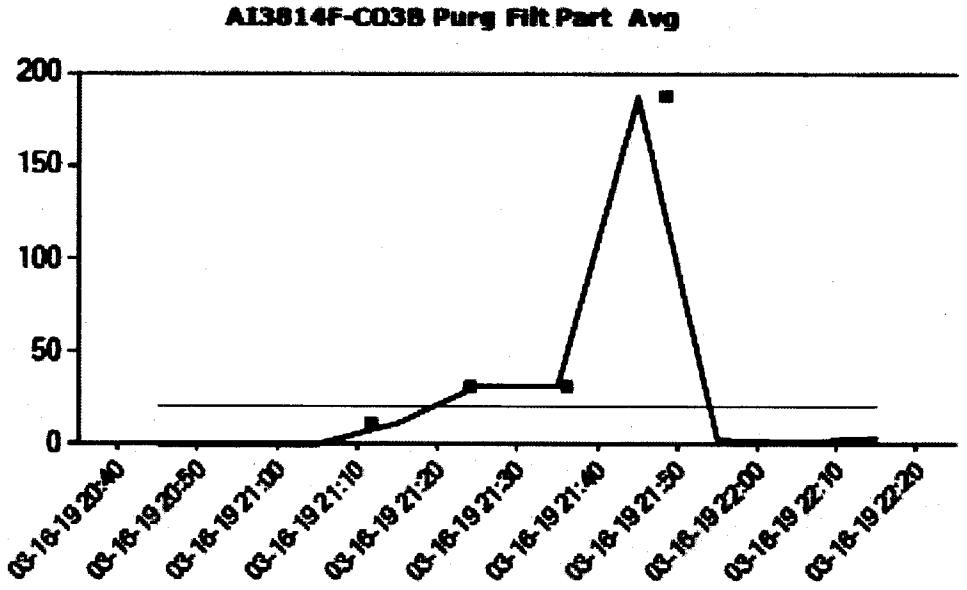
CO-6 S Purge Filter, 3/16/2019, 2:05 – 2:35; South side of unit was started-up, pulled and cleaned the probe, moisture on the probe



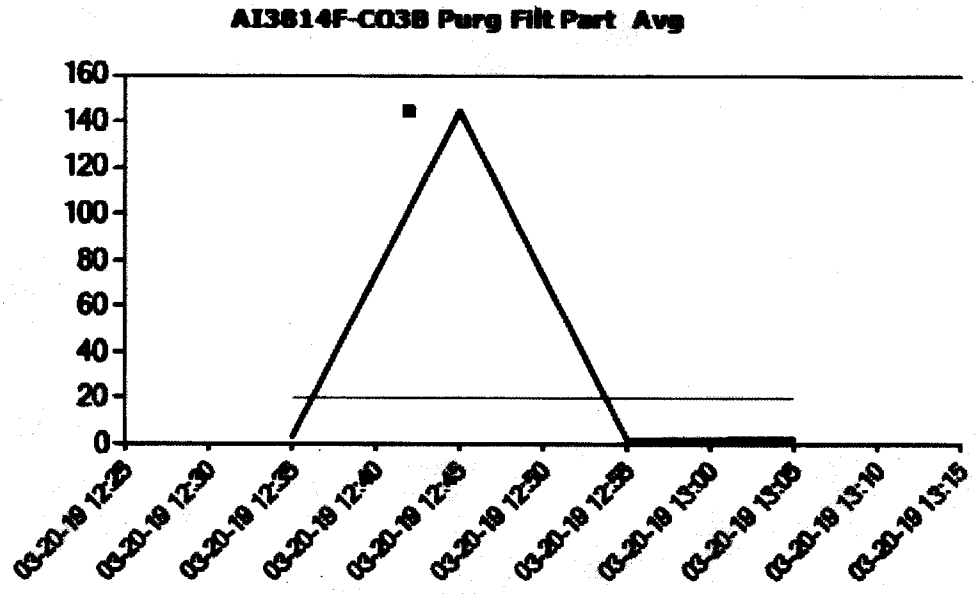
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 3/16/2019, 21:25 – 21:55; Unit start-up, pulled and cleaned probe, moisture on the probe



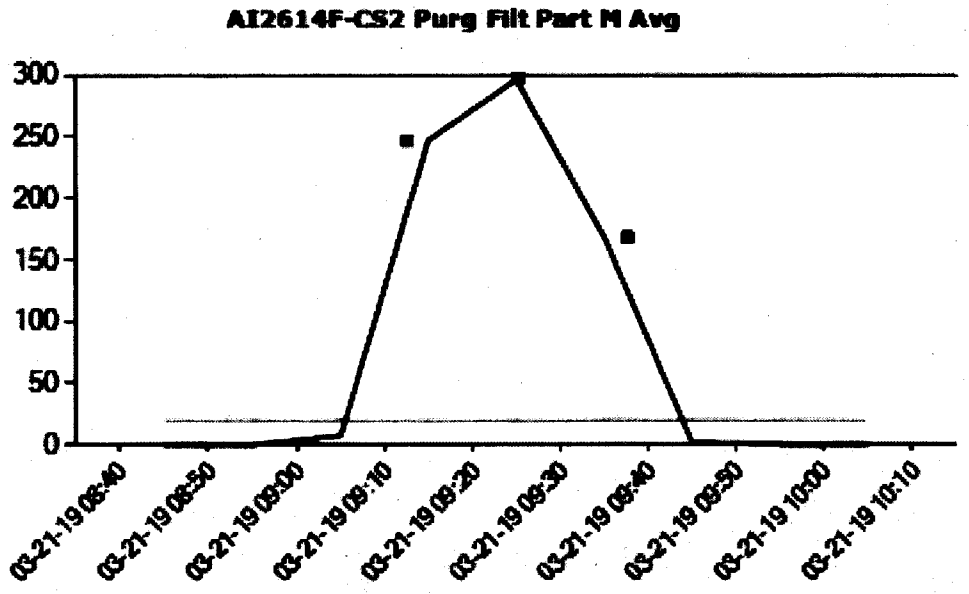
CO-3B Purge Filter, 3/20/2019, 12:45- 12:55; Pulled and cleaned the probe



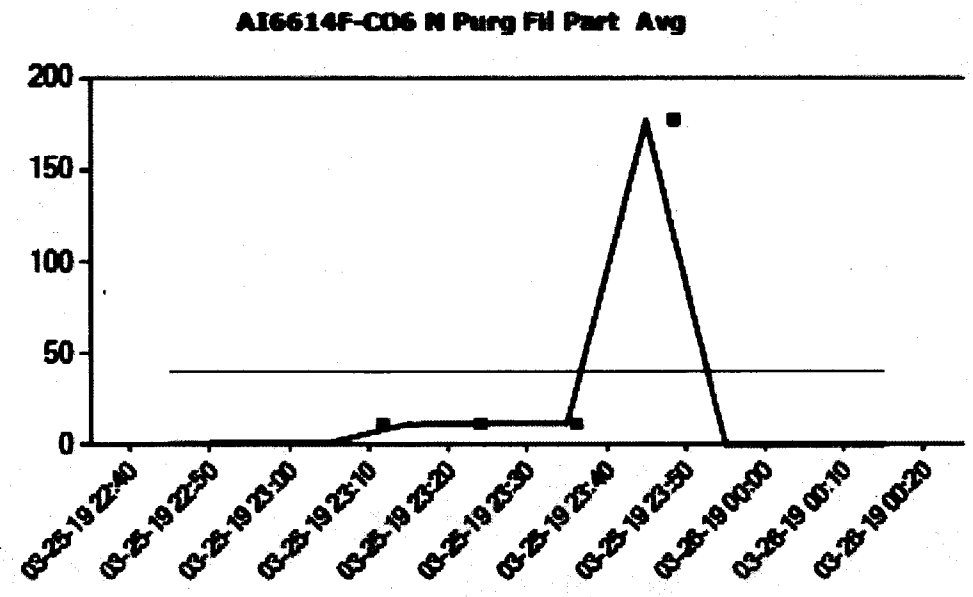
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-2 Purge Filter, 3/21/2019, 9:15- 9:45; Pulled and cleaned the probe



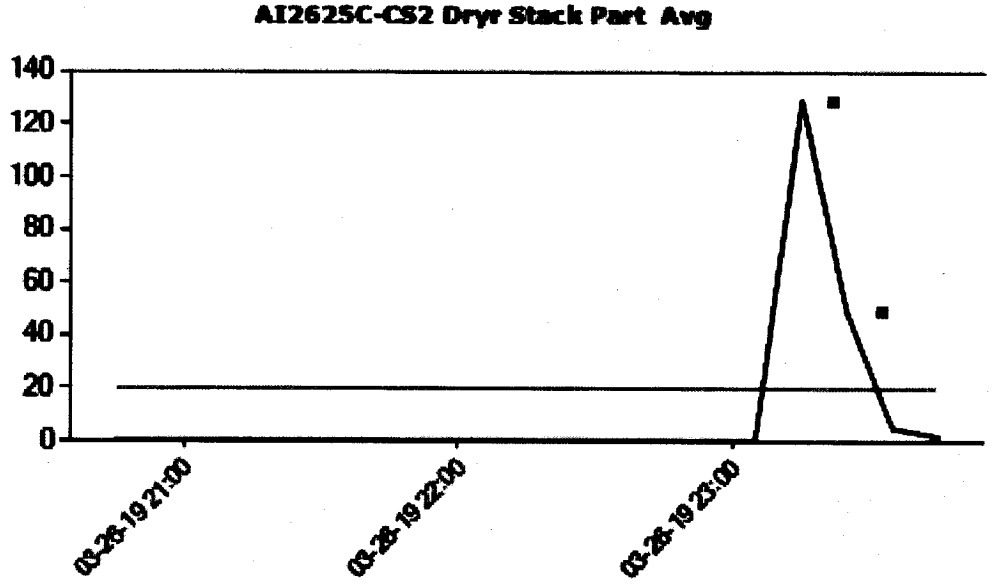
CO-6 N Purge Filter, 3/25/2019, 23:45- 23:55; Pulled and cleaned the probe, moisture on the probe



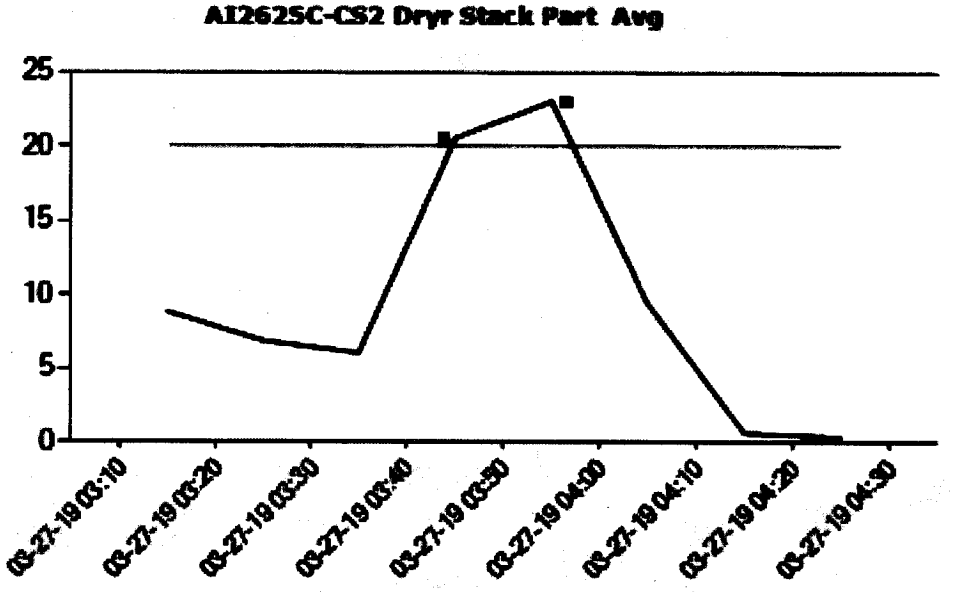
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-2 Dryer, 3/26/2019, 23:15- 23:35, Start-up of the dryer, moisture on the probe



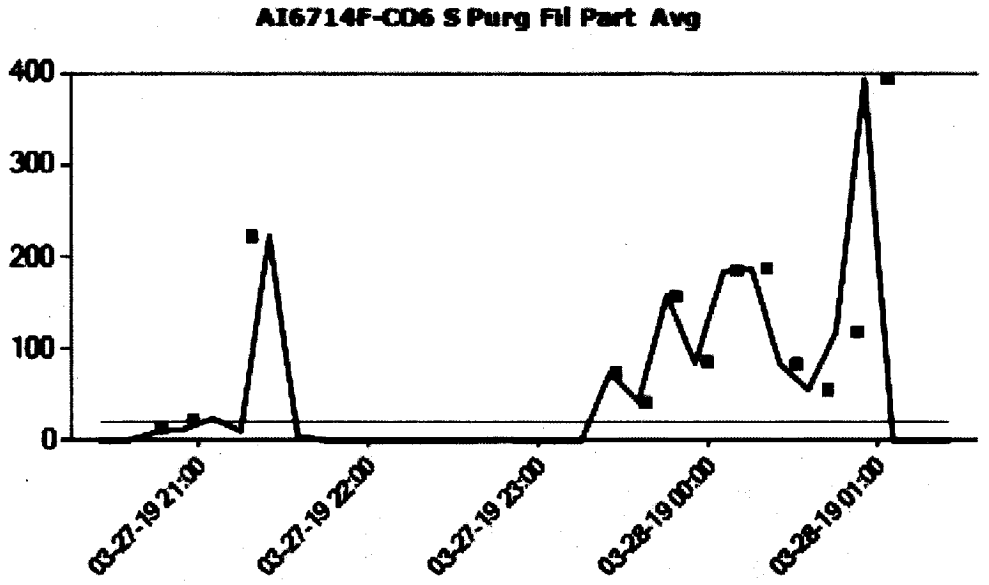
CS-2 Dryer, 3/27/2019, 3:45- 4:05; Start-up of the dryer



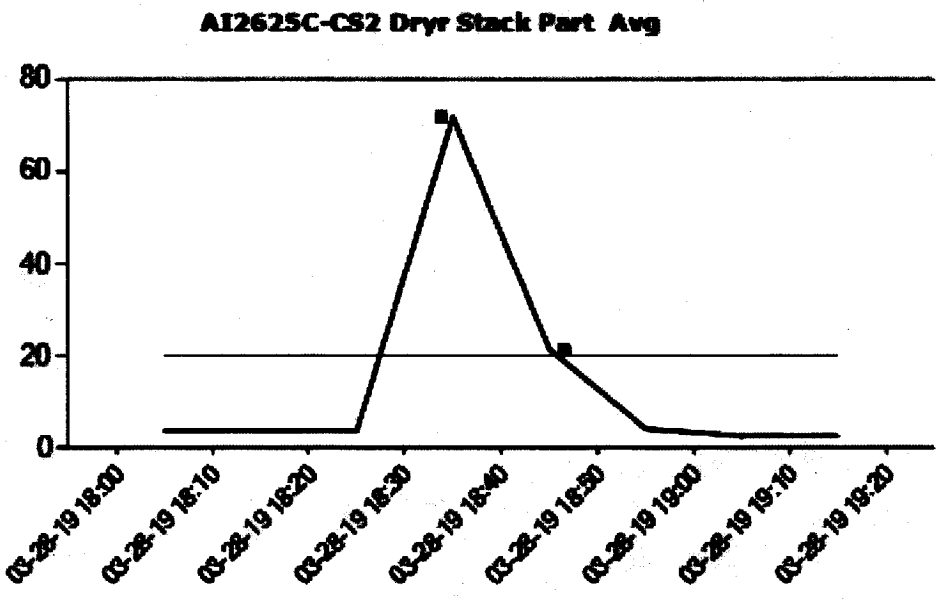
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 S Purge Filter, 3/27/2019 – 3/28/2019, 21:05 – 1:05; Pulled and cleaned the probe, moisture on the probe, technical difficulties resulting in I&E servicing the probe



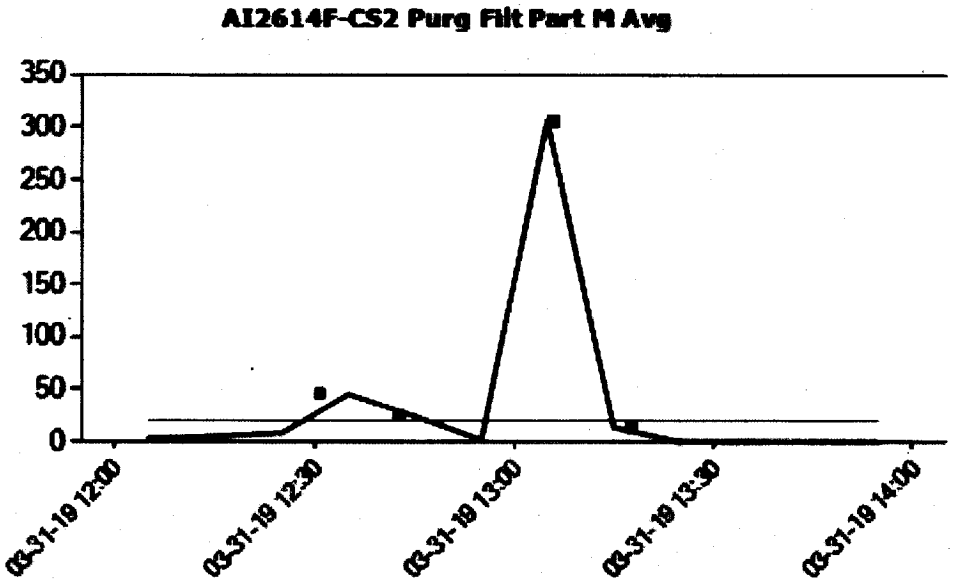
CS-2 Dryer, 3/28/2019, 18:35 – 18:55; Unit start-up



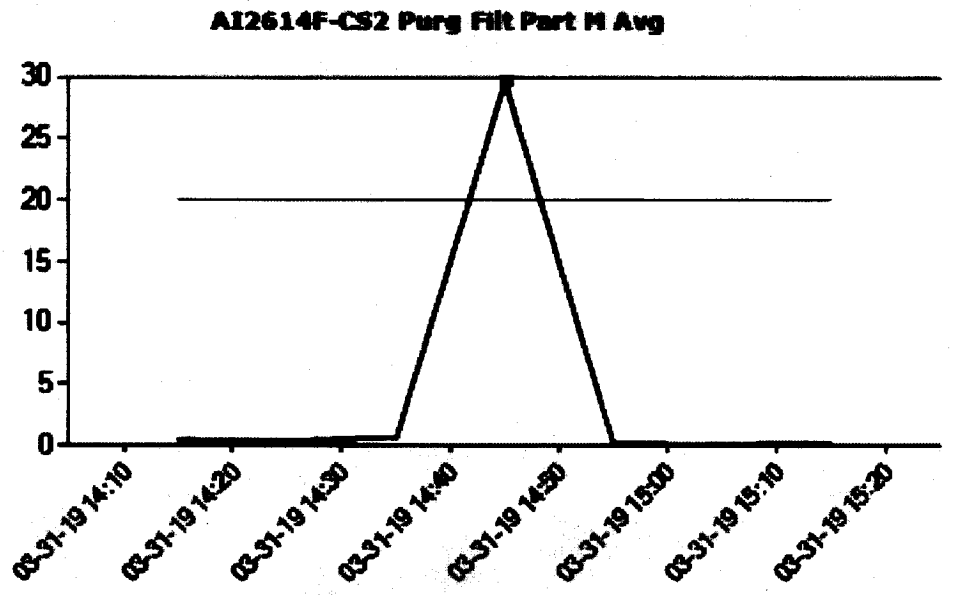
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-2 Purge Filter, 3/31/2019, 12:35- 13:15; Pulled and cleaned the probe, moisture on the probe



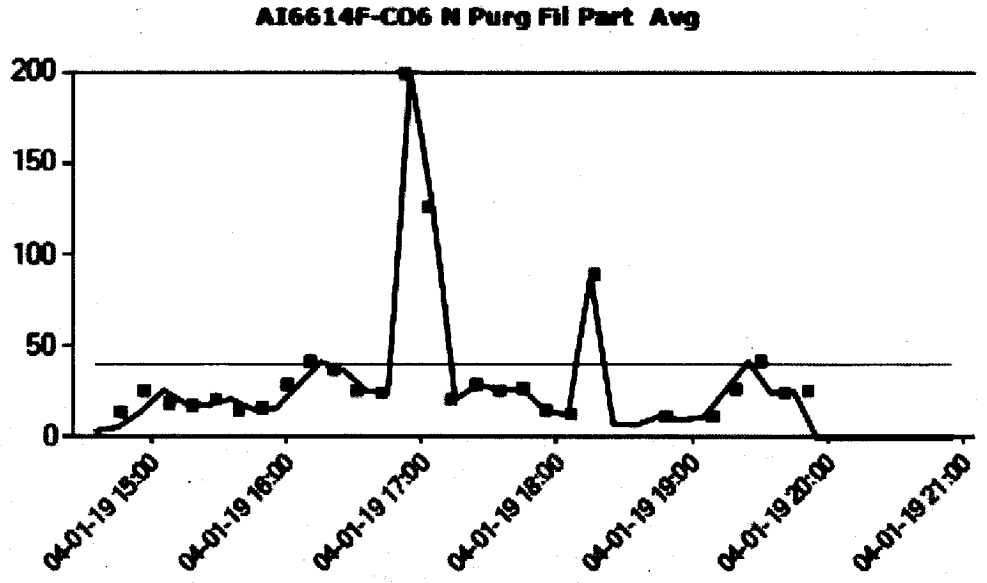
CS-2 Purge Filter, 3/31/2019, 14:45 – 14:55; Sudden spike



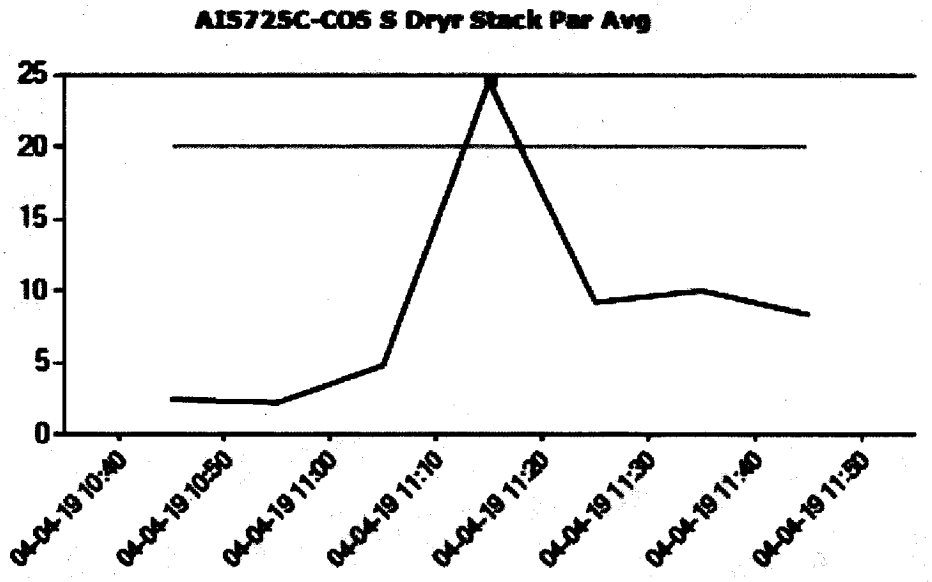
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 N Purge Filter, 4/1/2019, 16:15 – 19:35; Filter leak, shut unit down



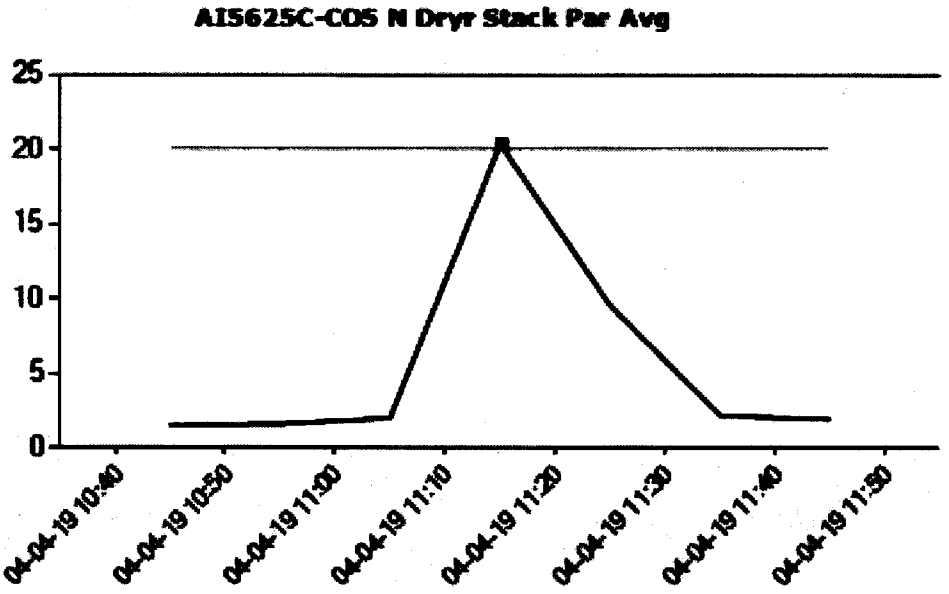
CO-5 S Dryer, 4/4/2019, 11:15 – 11:25; Heavy rain event



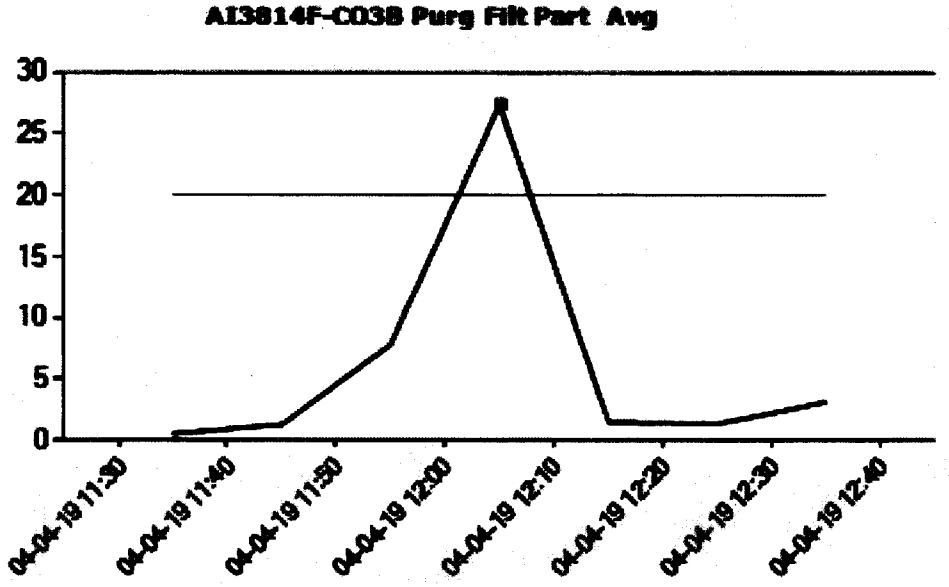
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 N Dryer, 4/4/2019, 11:15 – 11:25; Heavy rain event



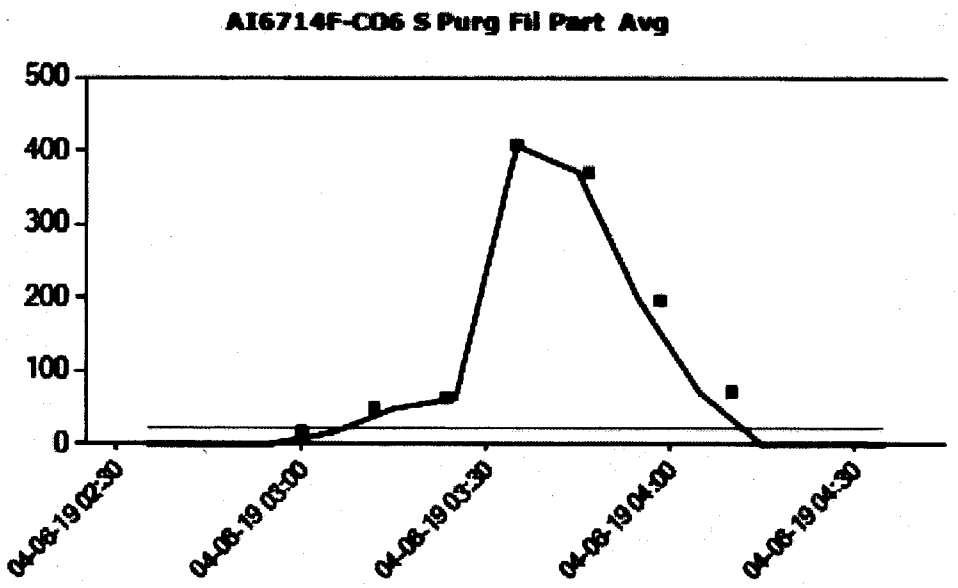
CO-3B Purge Filter, 4/4/2019, 12:05 – 12:15; Heavy rain event



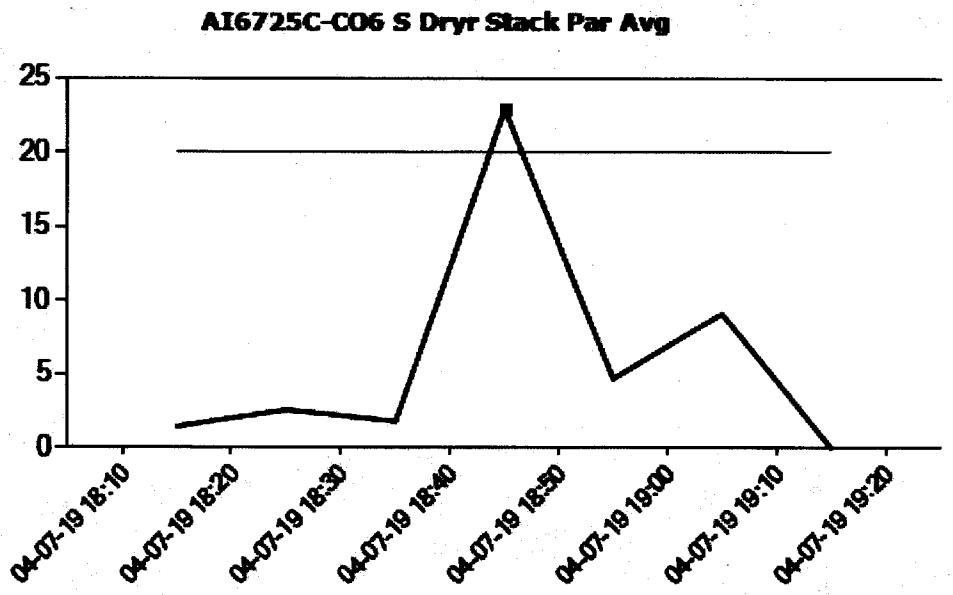
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 S Purge Filter, 4/6/2019, 3:15 – 4:15; Unit start-up, pulled and cleaned the probe, moisture on the probe



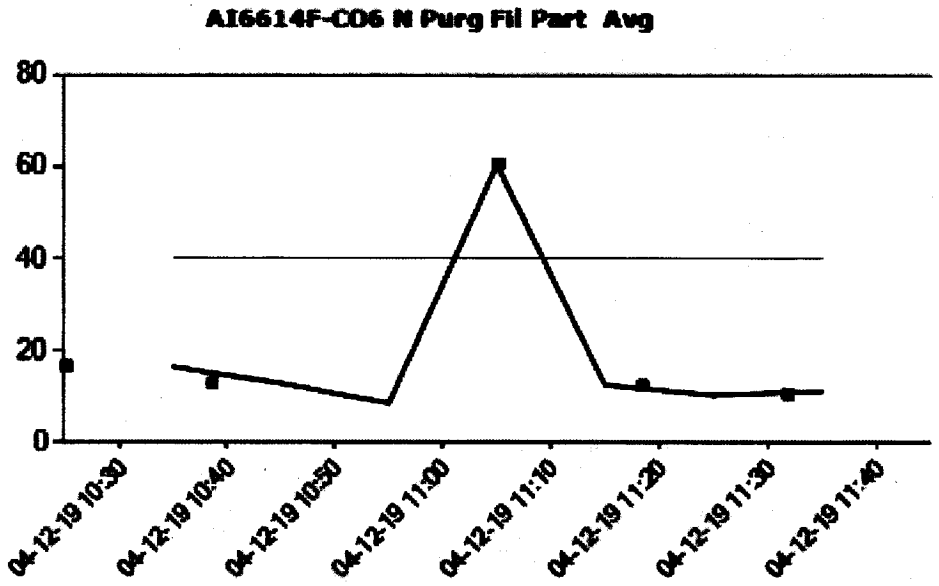
CO-6 S Dryer, 4/7/2019, 18:45 – 18:55; Heavy rain event



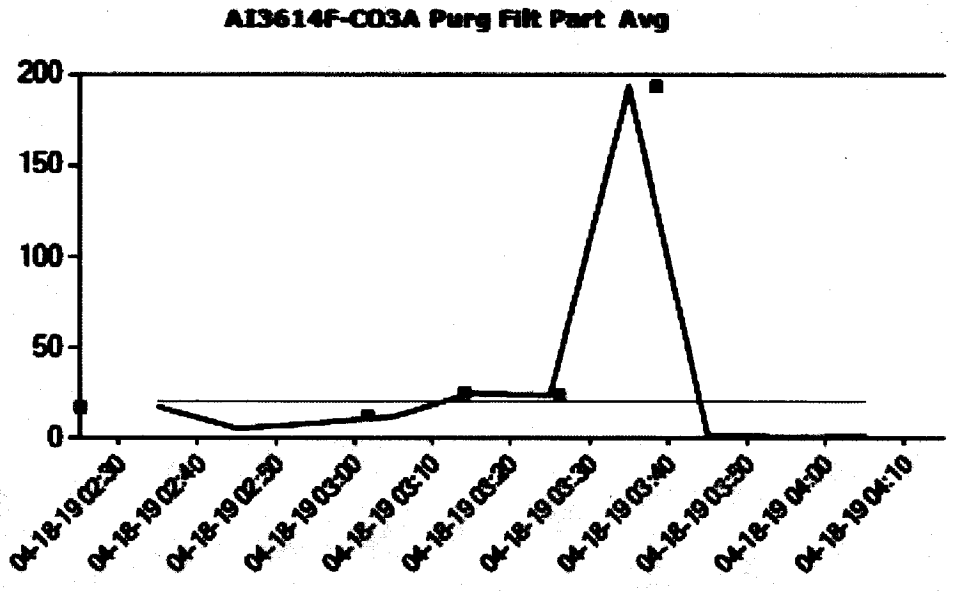
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 N Purge Filter, 4/12/2019, 11:05 – 11:15; Pulled and cleaned the probe



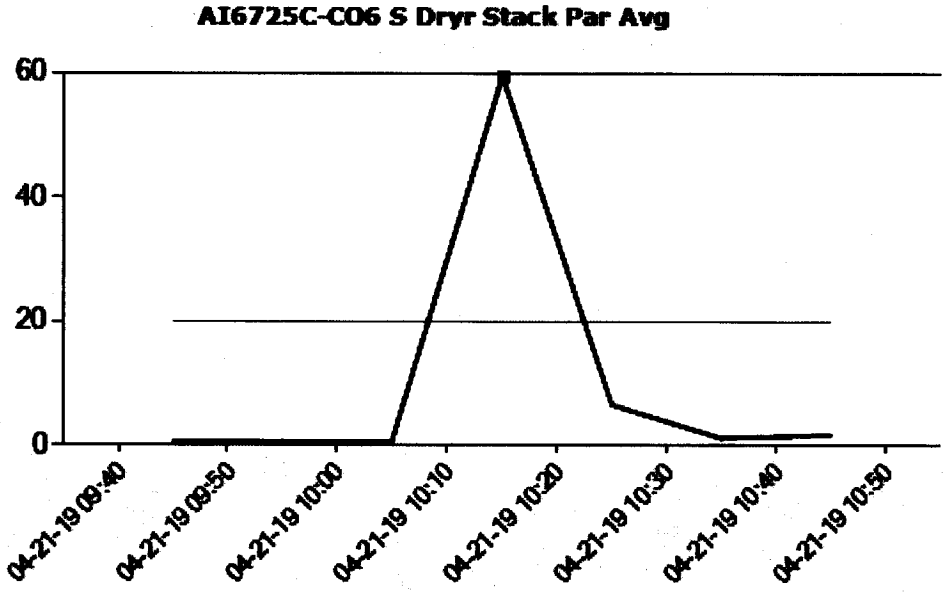
CO-3A Purge Filter, 4/18/2019, 3:15 – 3:45; Pulled and clean the probe, build-up on the probe



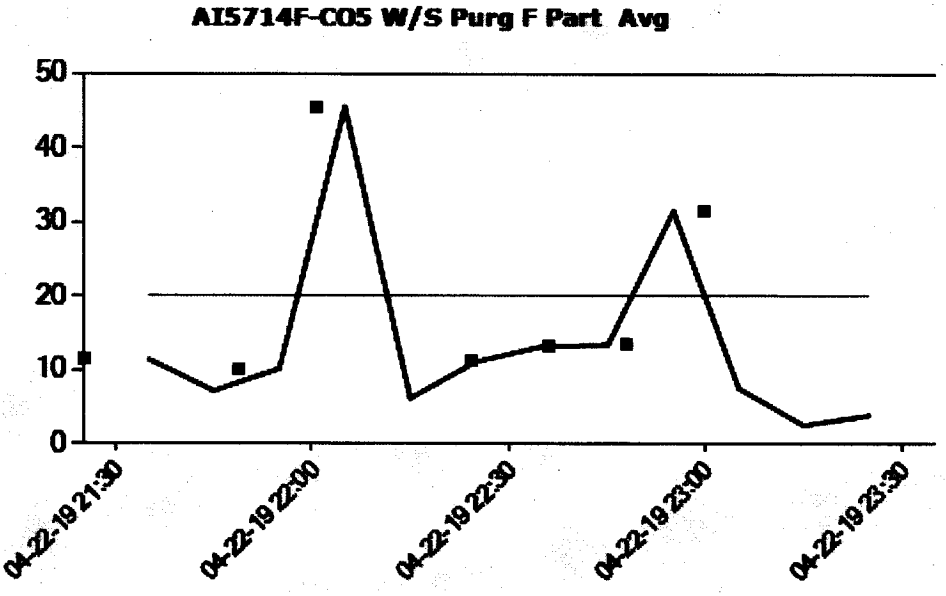
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 S Dryer, 4/21/2019, 10:15 – 10:25; Sudden spike



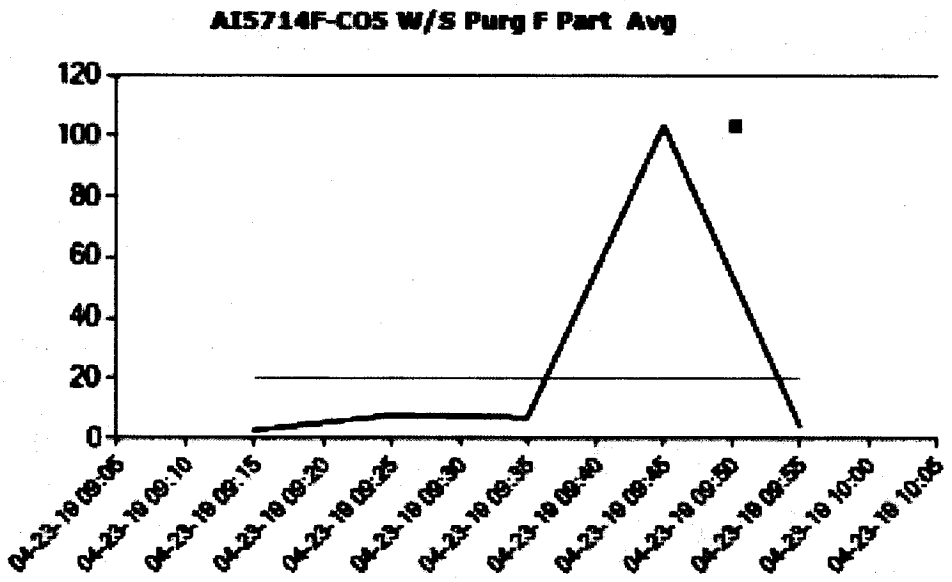
CO-5 W/S Purge Filter, 4/22/2019, 22:05 – 23:05; Filter leak, plugged the filter, pulled and cleaned the probe



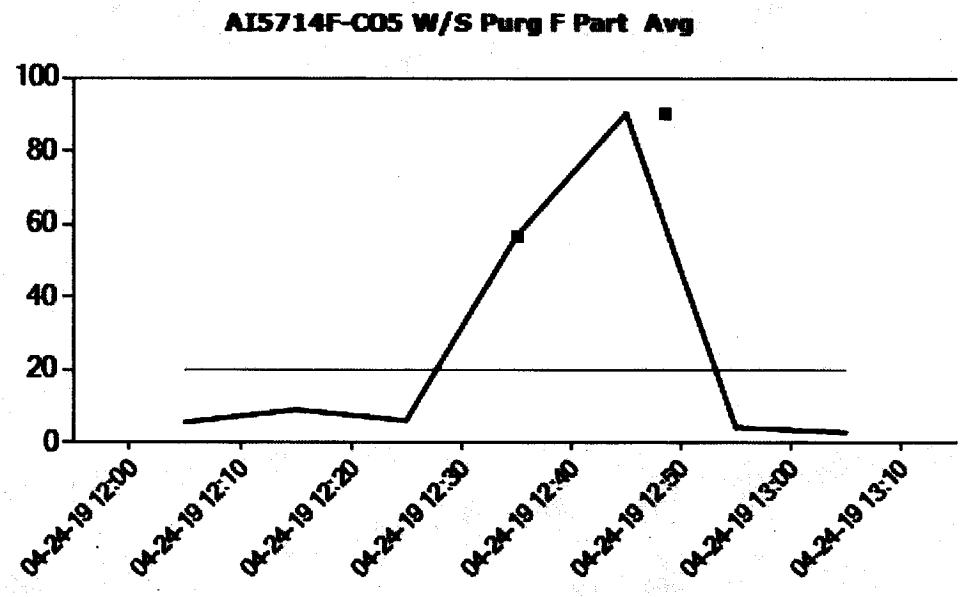
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 4/23/2019, 9:45 – 9:55; Pulled and cleaned the probe



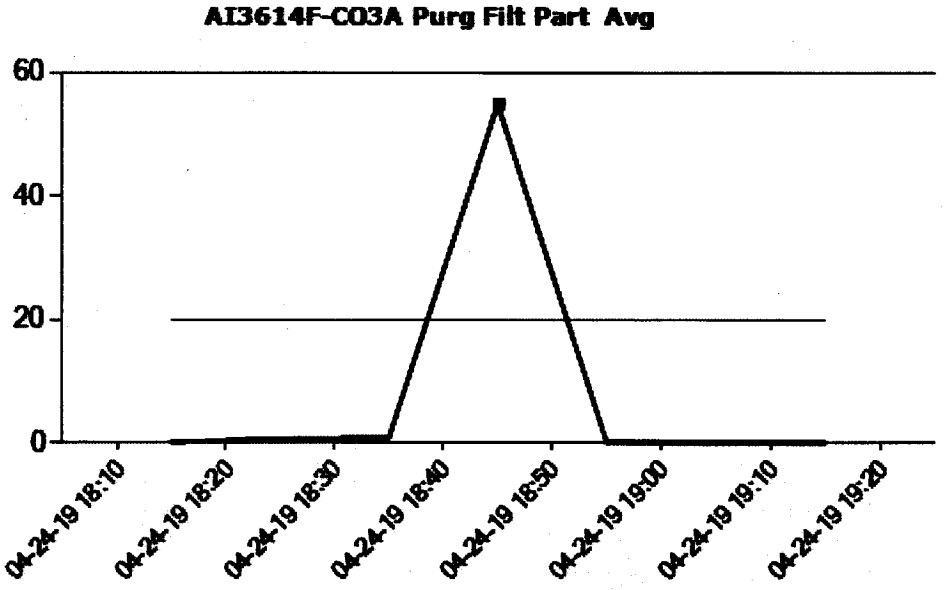
CO-5 W/S Purge Filter, 4/24/2019, 12:35 – 12:55; Pulled and cleaned probe



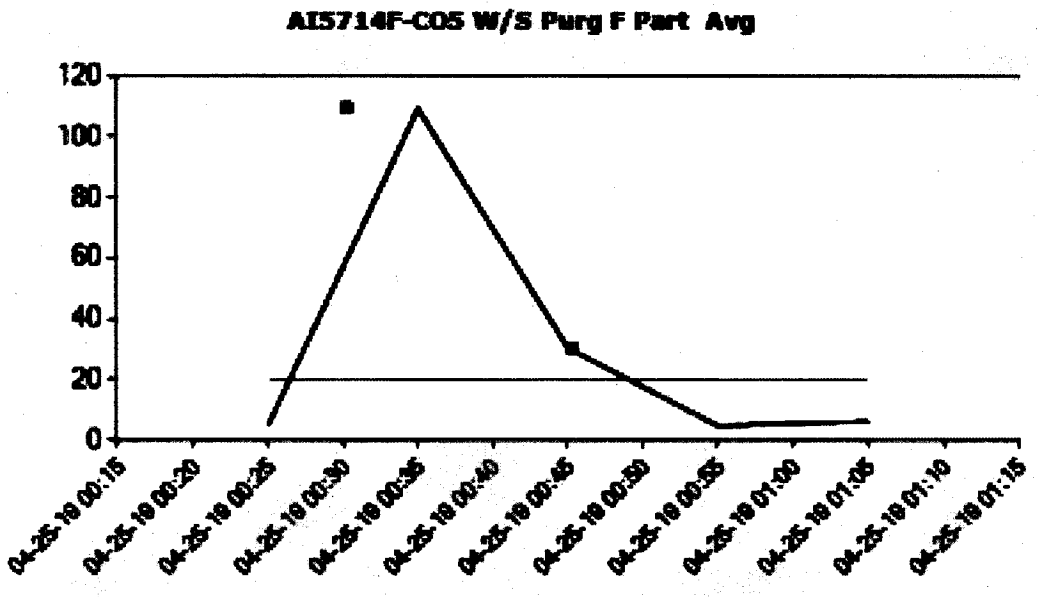
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3A Purge Filter, 4/24/2019, 18:45 – 18:55; Unit start-up



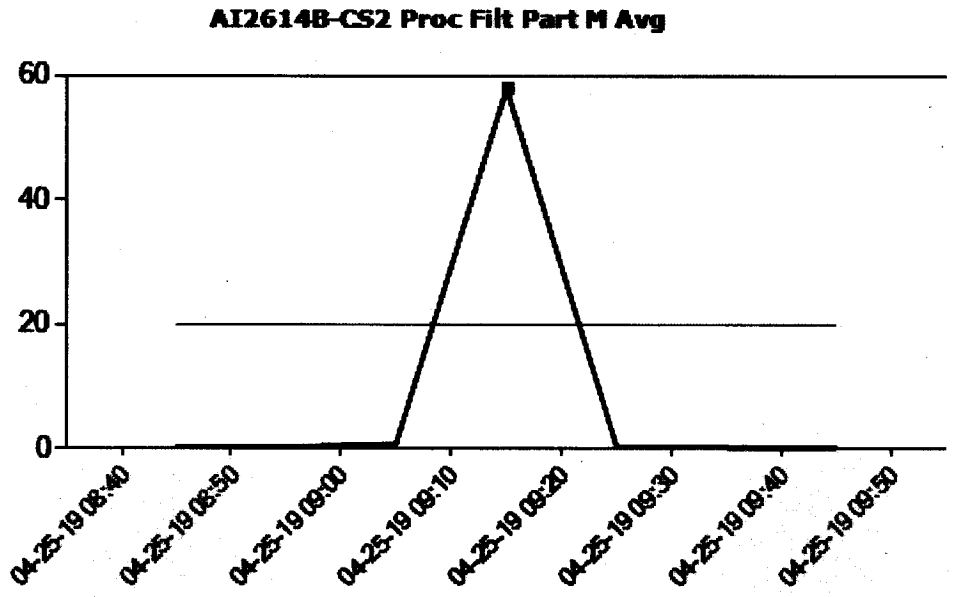
CO-5 W/S Purge Filter, 4/25/2019, 00:35 – 00:55; Pulled and cleaned the probe, suspected leak



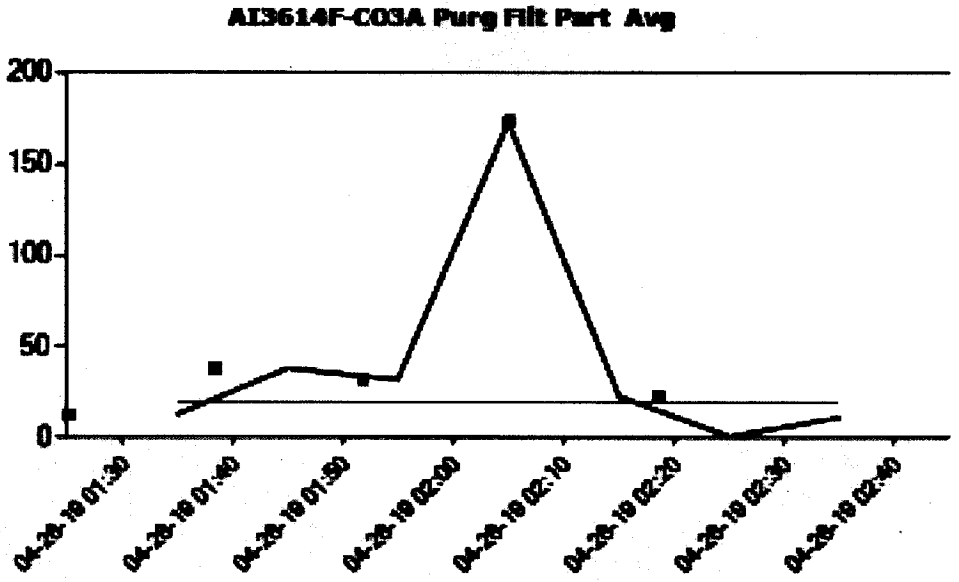
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-2 Process Filter, 4/25/2019, 9:15 – 9:25; Heavy rain event



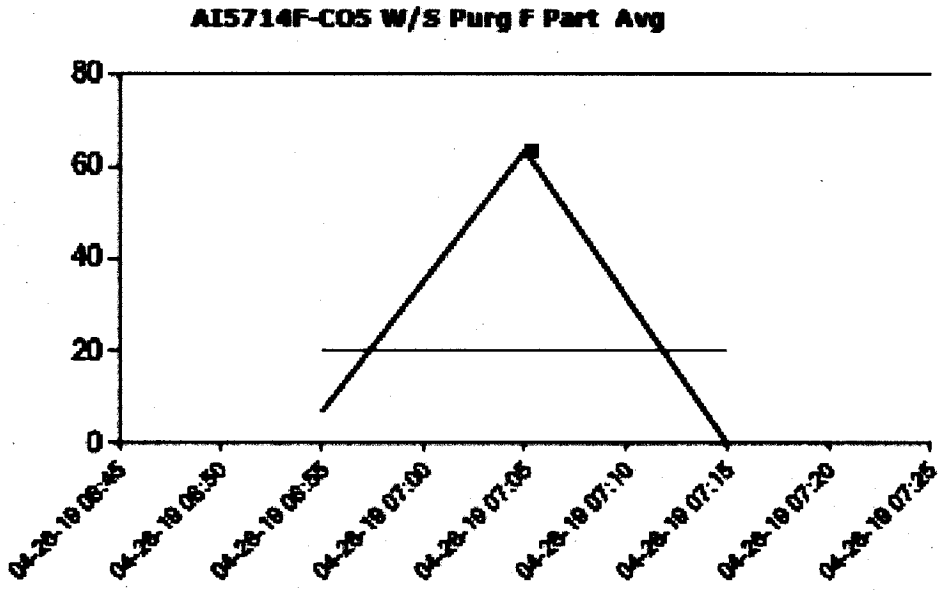
CO-3A Purge Filter, 4/26/2019, 1:45 – 2:25; Unit start-up, pulled and cleaned the probe, moisture on the probe



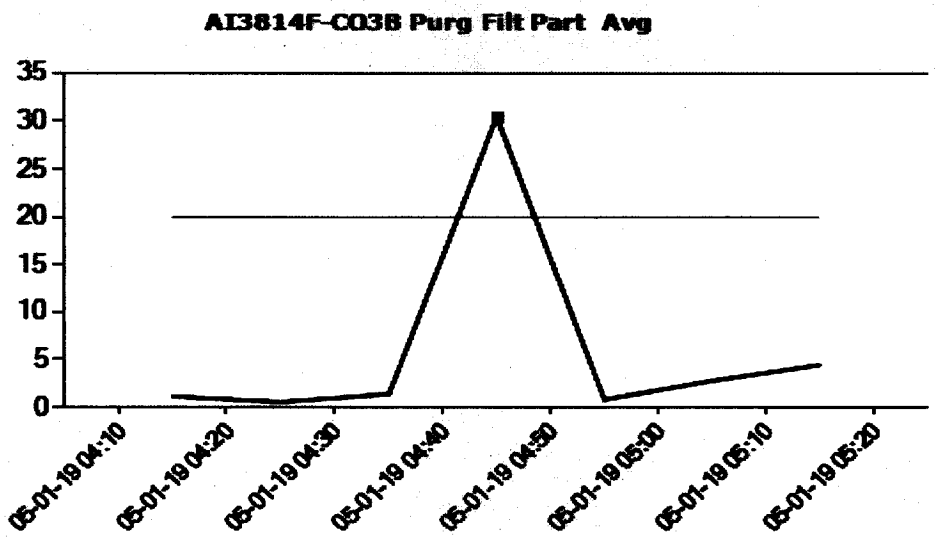
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 4/26/2019, 7:05 – 7:15; Filter leak, plugged filter



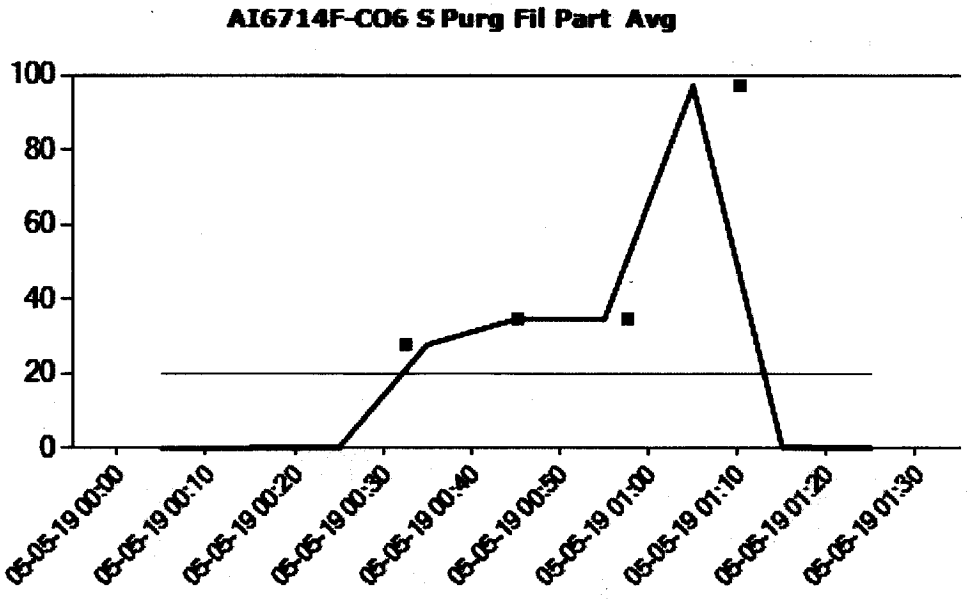
CO-3B Purge Filter, 5/1/2019, 4:45 – 4:55; Sudden spike



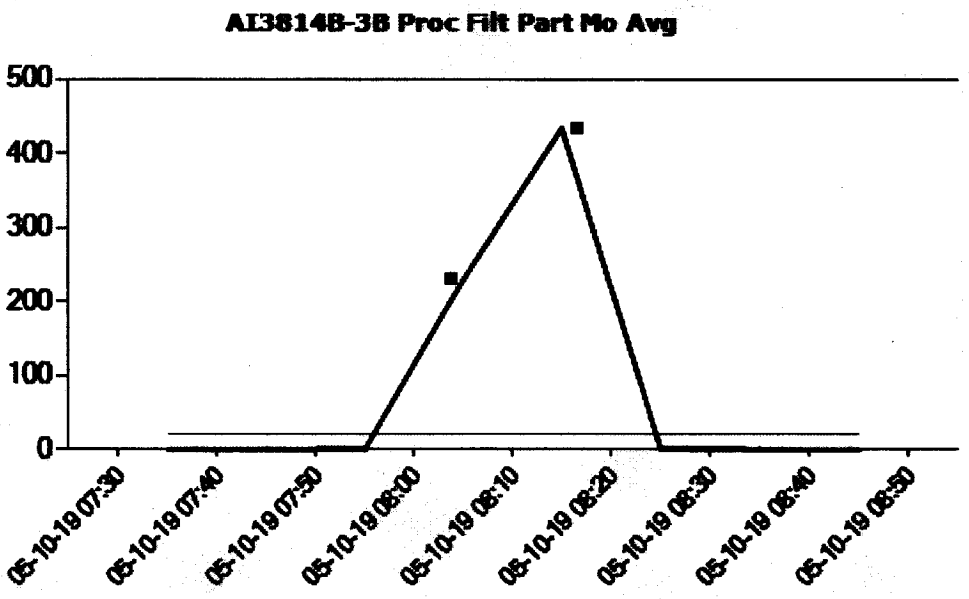
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 S Purge Filter, 5/5/2019, 00:35 – 1:15; Start-up of a reactor, pulled and cleaned the probe



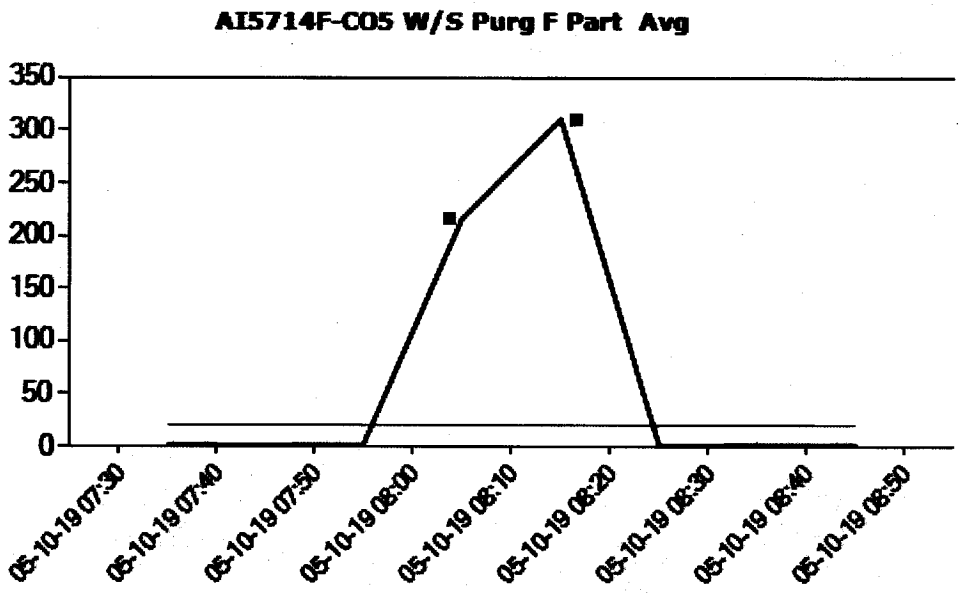
CO-3B Process Filter, 5/10/2019, 8:05 – 8:25; Heavy rain event



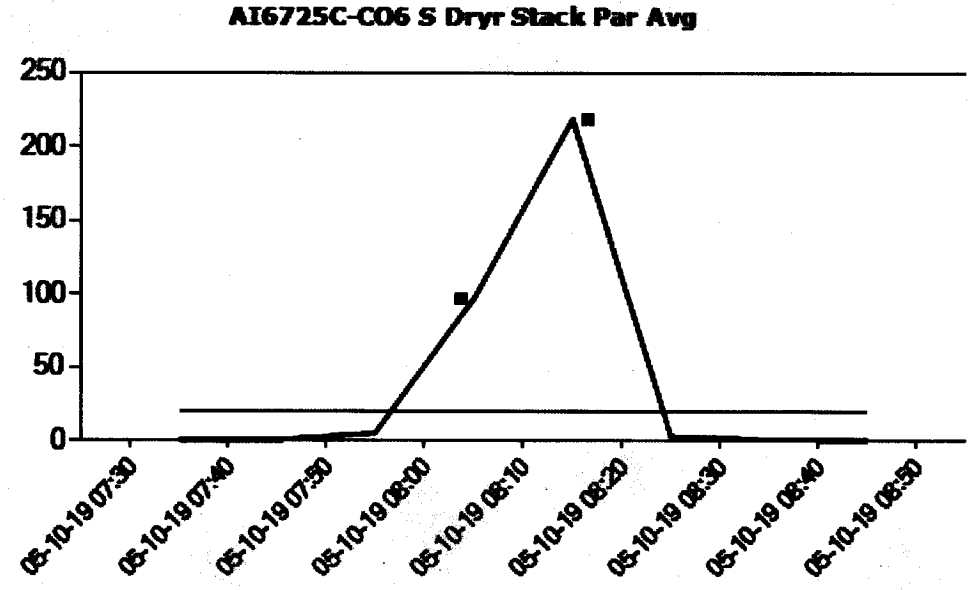
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 5/10/2019, 8:05 – 8:25; Heavy rain event



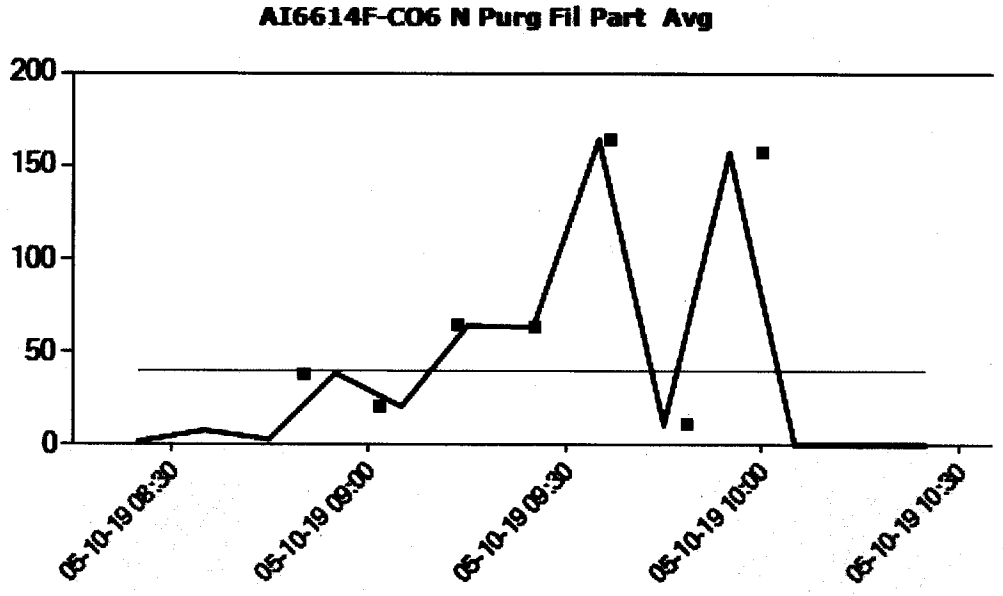
CO-6 S Dryer, 5/10/2019, 8:05 – 8:25; Heavy rain event



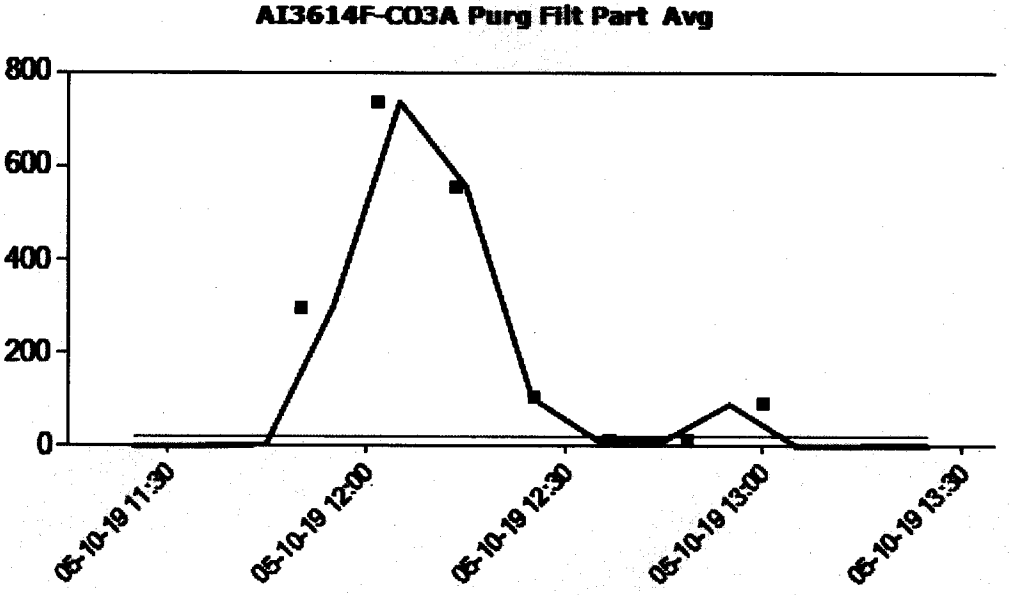
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 N Purge Filter, 5/10/2019, 9:15 – 10:05; Heavy rain event, pulled and cleaned probe



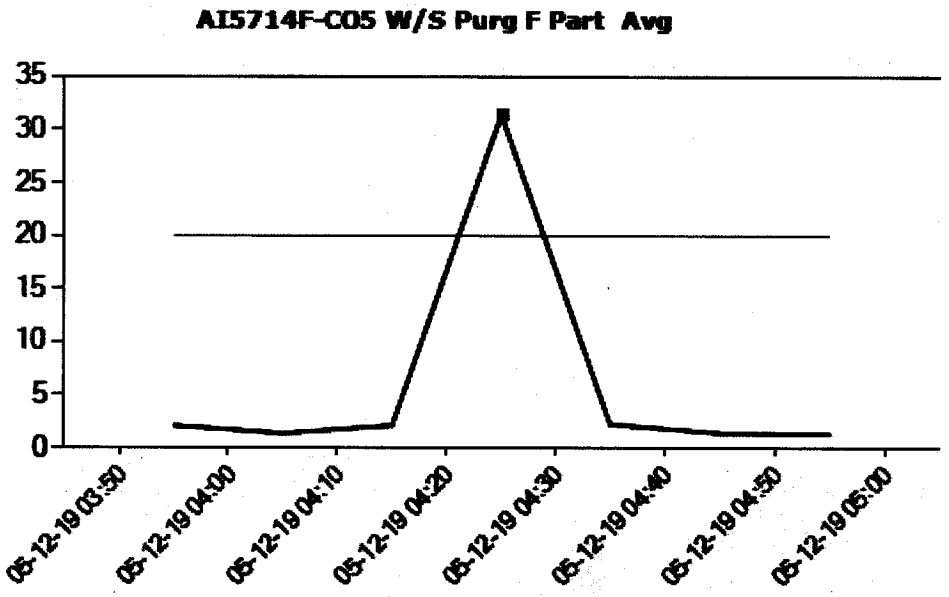
CO-3A Purge Filter, 5/10/2019, 11:55 – 13:05; Heavy rain event, pulled and cleaned probe, moisture on the probe



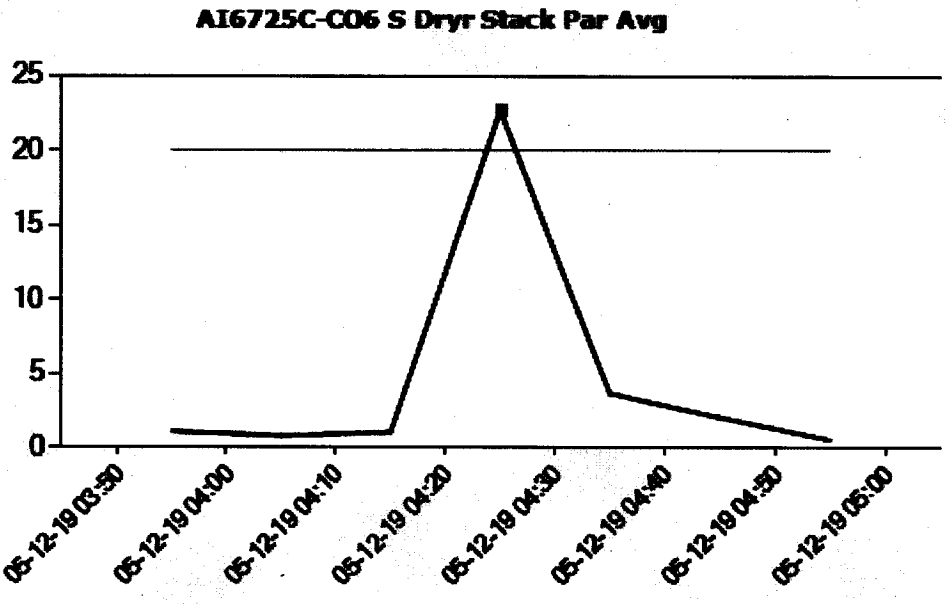
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 5/12/2019, 4:25 – 4:35; Heavy rain event



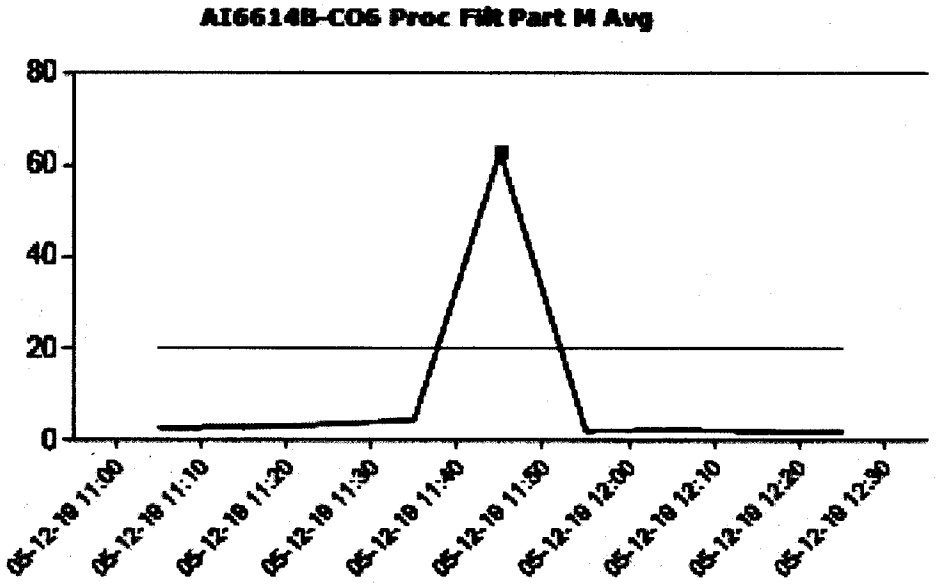
CO-6 S Dryer, 5/12/2019, 4:25 – 4:35; Heavy rain event



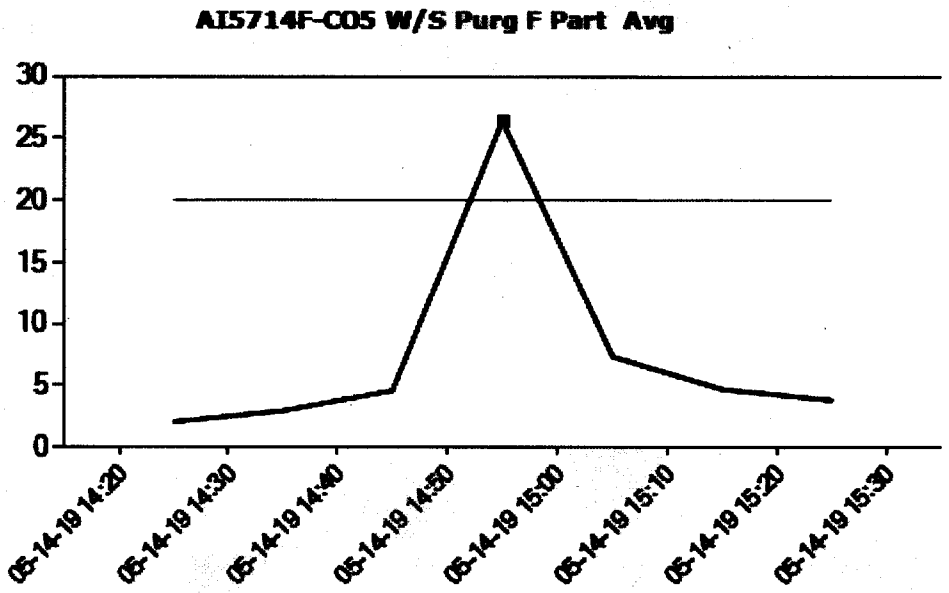
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 Process Filter, 5/12/2019, 11:45 – 11:55; Pulled and cleaned the probe



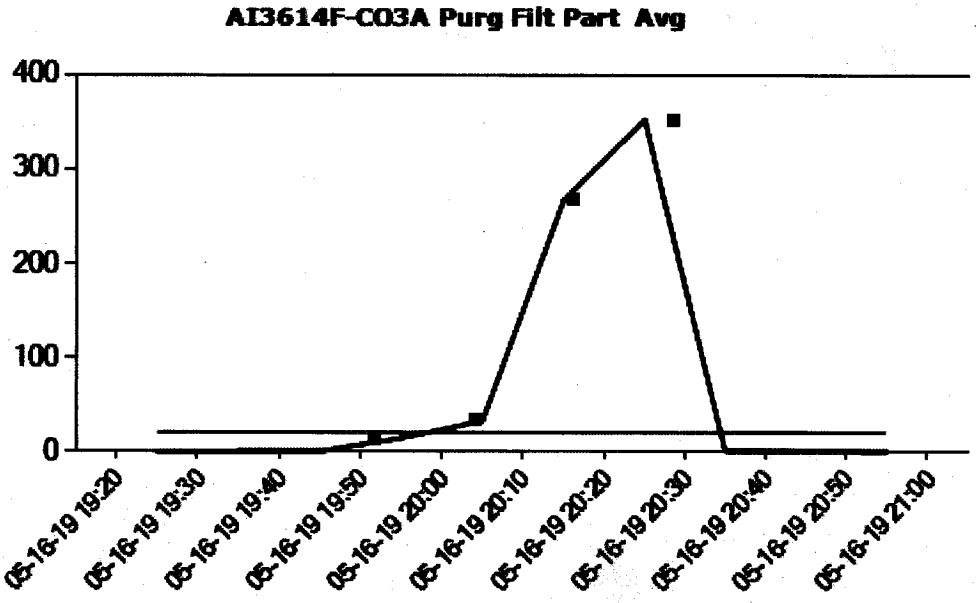
CO-5 W/S Purge Filter, 5/14/2019, 14:55 – 15:05; Sudden spike



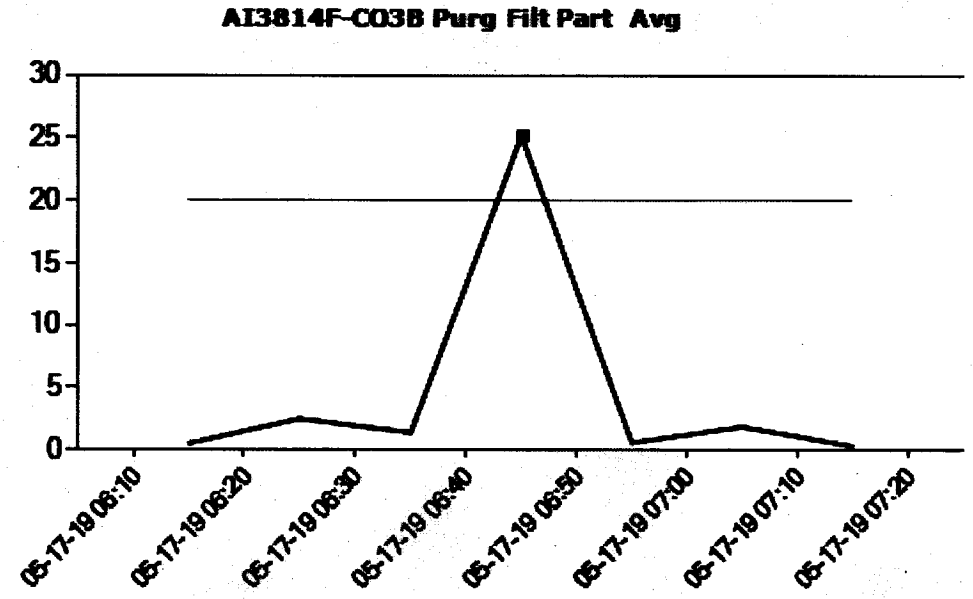
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3A Purge Filter, 5/16/2019, 20:05 – 20:35; Unit start-up, pulled and cleaned the probe, moisture on the probe



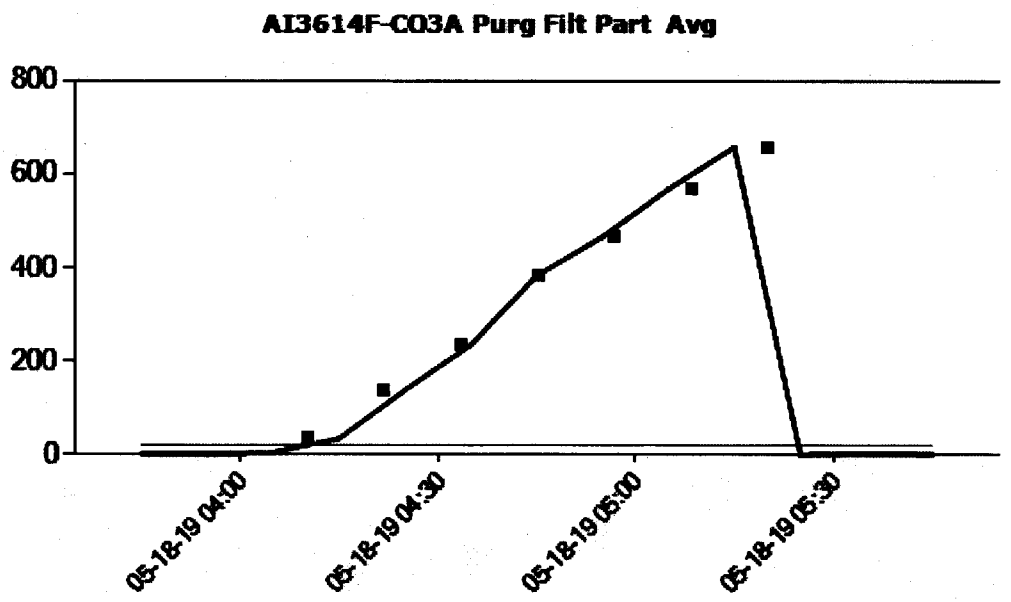
CO-3B Purge Filter, 5/17/2019, 6:45 – 6:55; Unit start-up



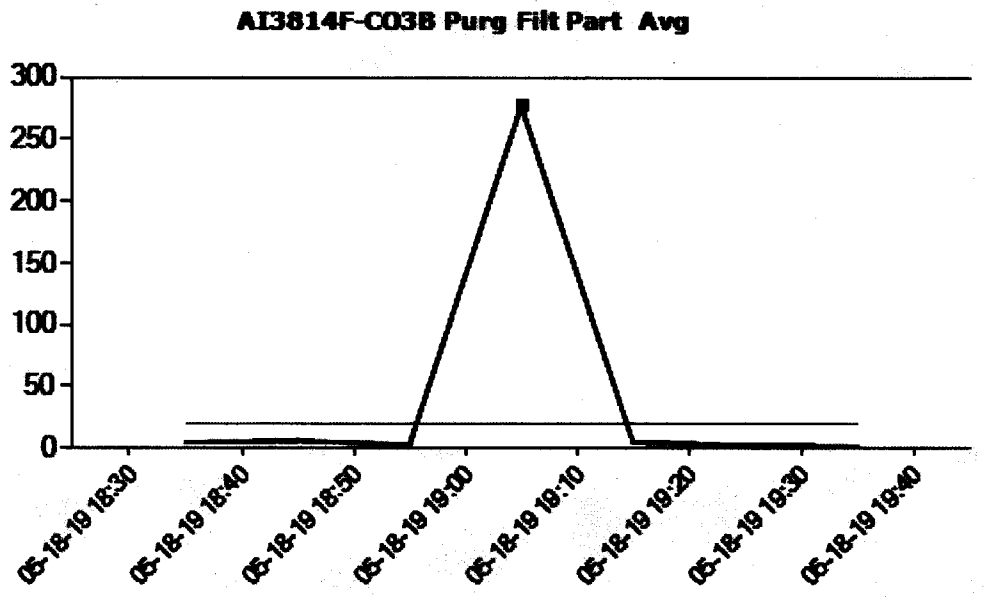
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3A Purge Filter, 5/18/2019, 4:15 – 5:25; Pulled and cleaned probe, moisture on probe, technical difficulties with probe, I&E serviced the probe



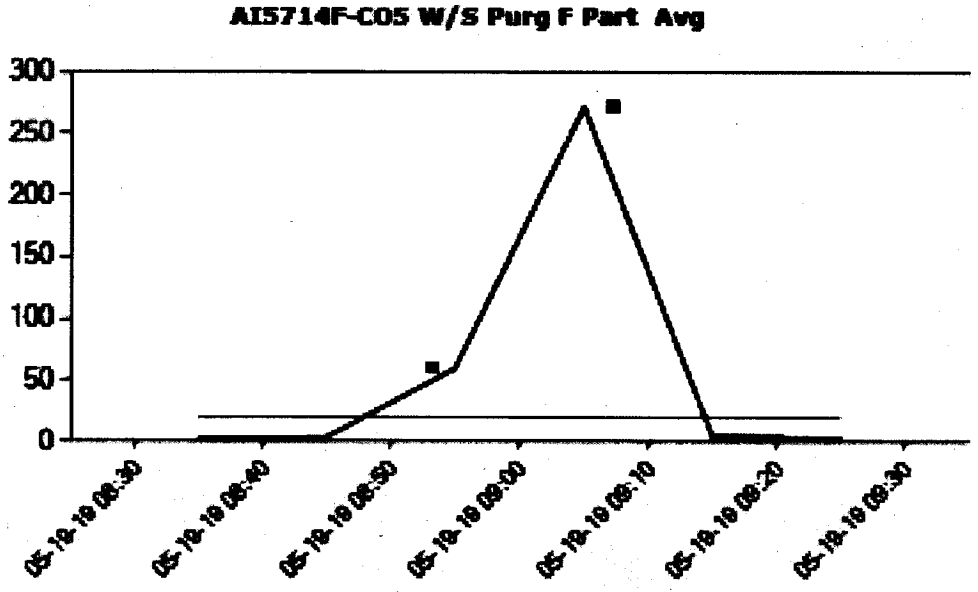
CO-3B Purg Filter, 5/18/2019, 19:05 – 19:15; Pulled and cleaned the probe



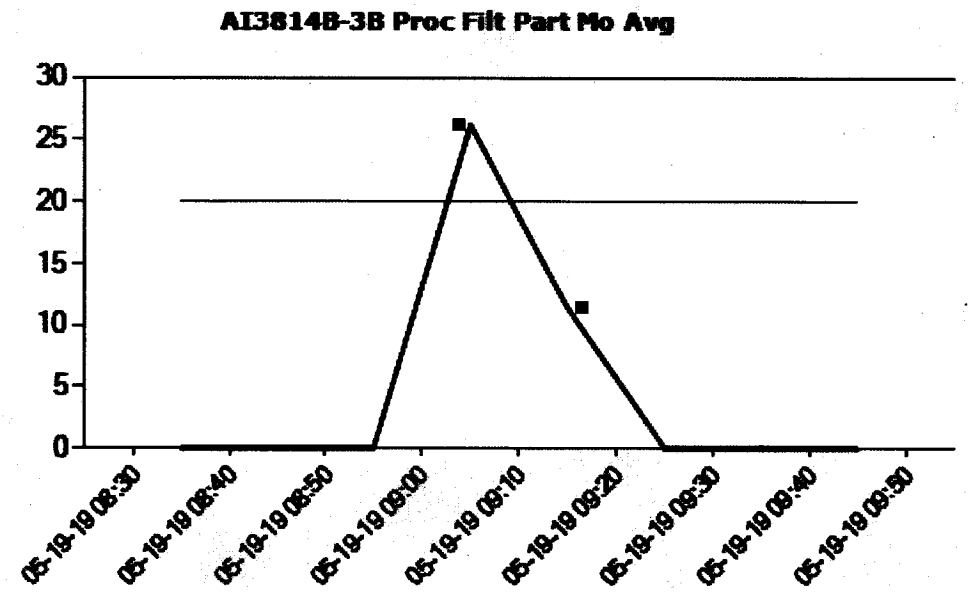
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 5/19/2019, 8:55 – 9:15; Heavy rain event



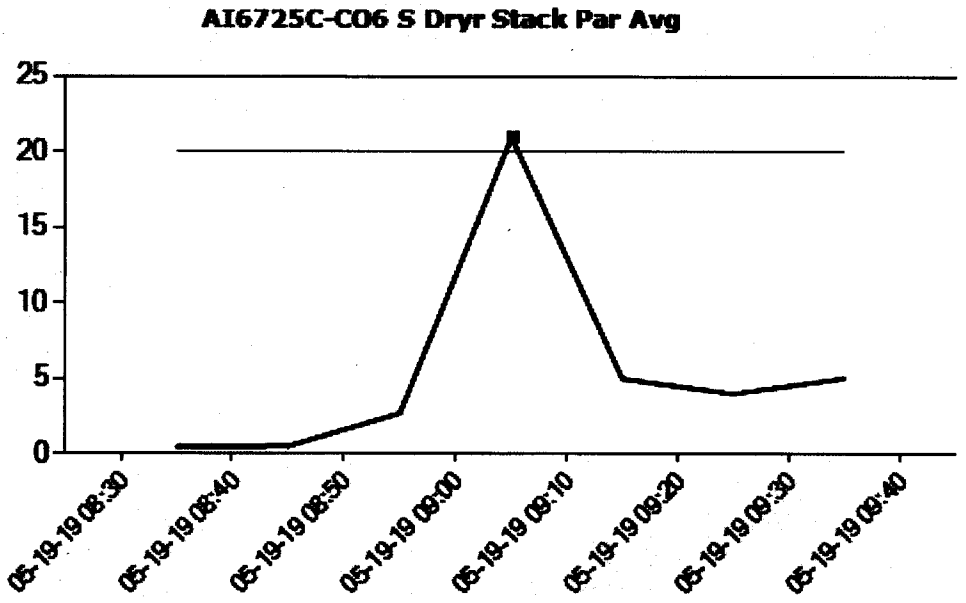
CO-3B Process Filter, 5/19/2019, 9:05 – 9:15; Heavy rain event



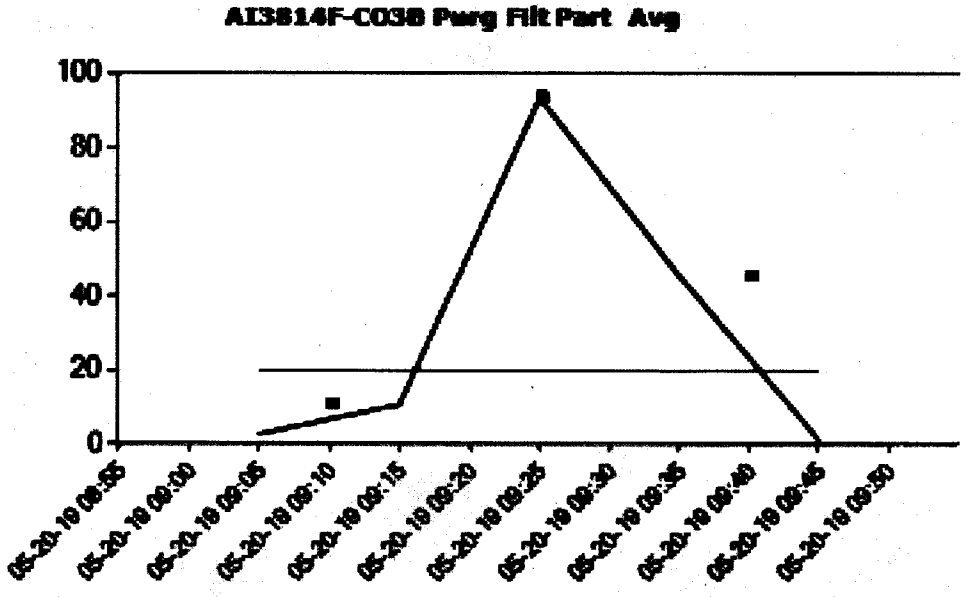
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 S Dryer, 5/19/2019, 9:05 – 9:15; Heavy rain event



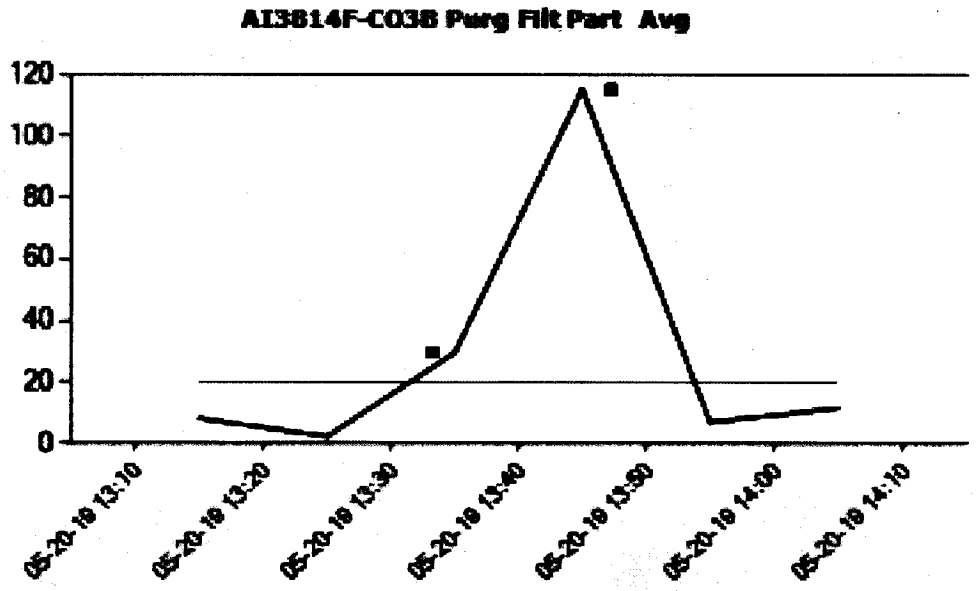
CO-3B Purge Filter, 5/20/2019, 9:25 – 9:35; Suspected leak, pulled and cleaned the probe



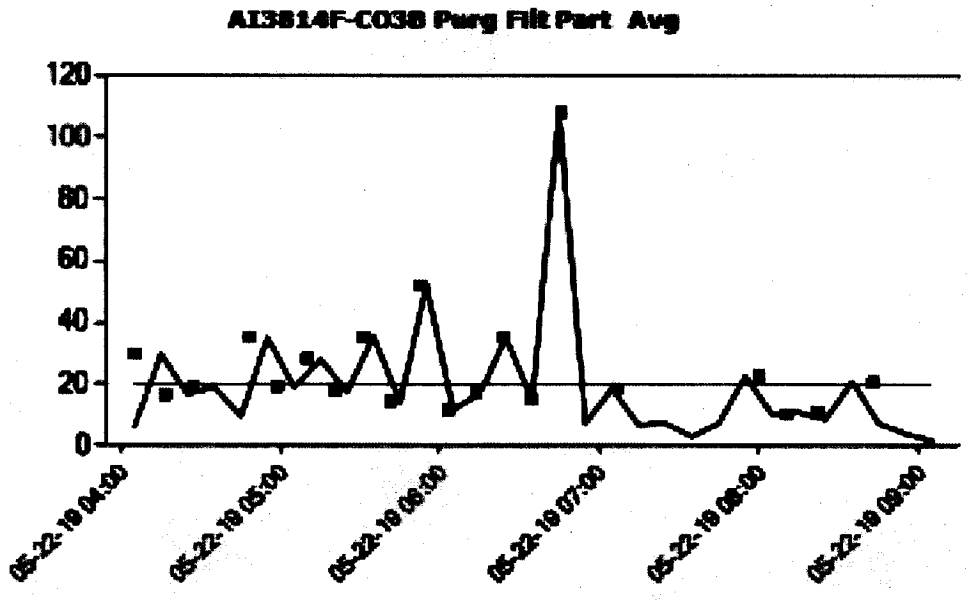
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 5/20/2019, 13:35 – 13:55; Suspected leak, pulled and cleaned the probe, plugged the filter



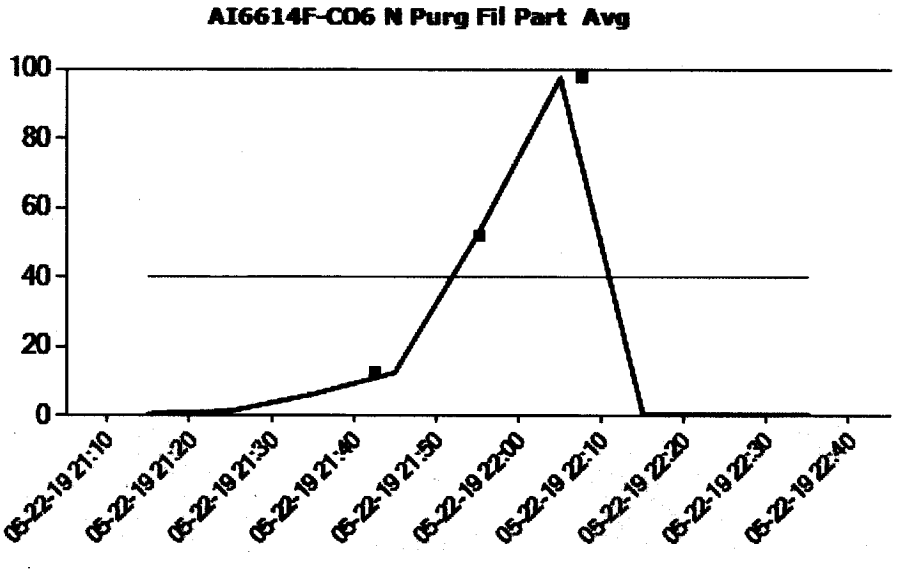
CO-3B Purge Filter, 5/22/2019, 4:15 – 8:45; Suspected leak, pulled and cleaned probe, plugged filter



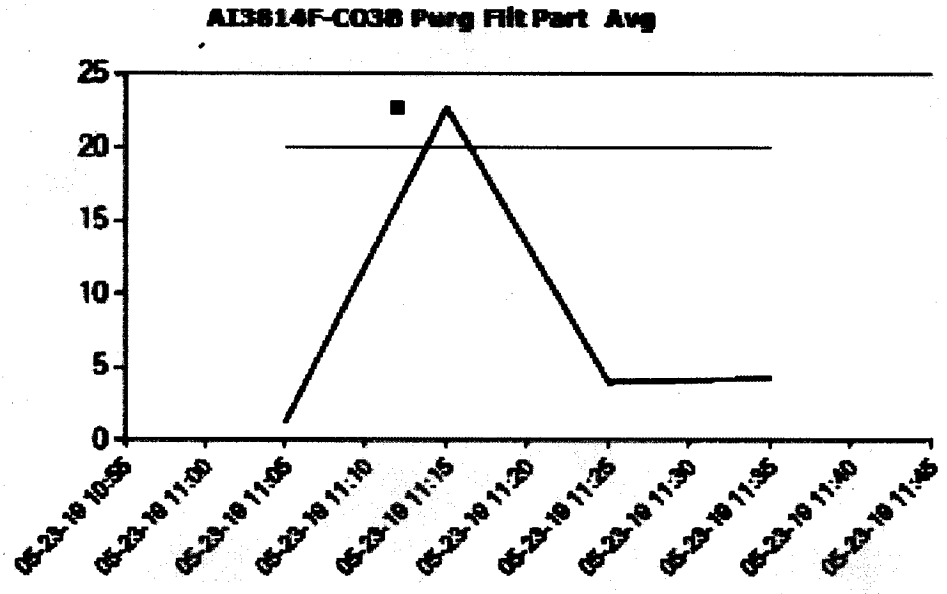
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 N Purge Filter, 5/22/2019, 21:55 – 22:15; Pulled and cleaned the probe, moisture on the probe



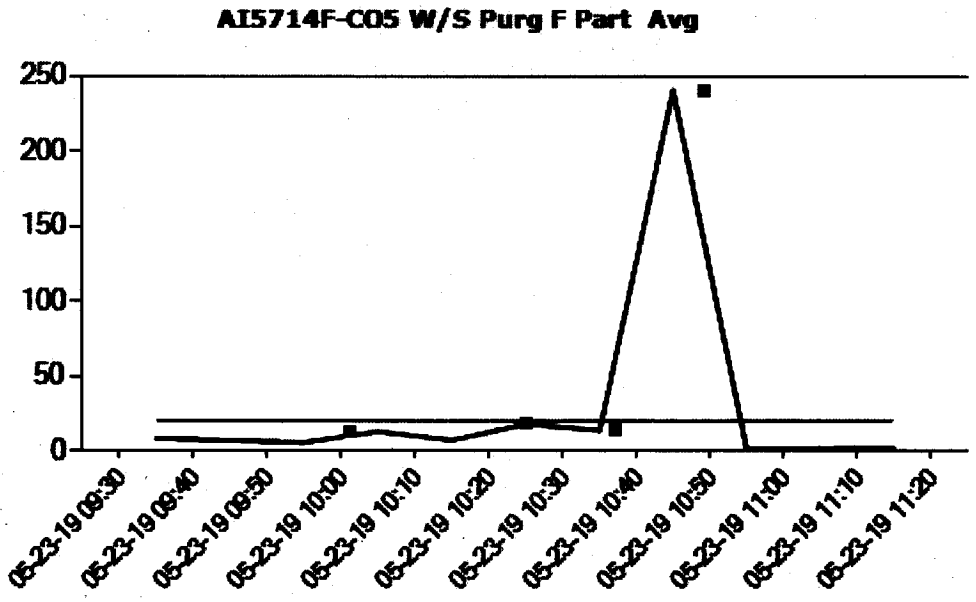
CO-3B Purge Filter, 5/23/2019, 11:15 – 11:25; Sudden spike



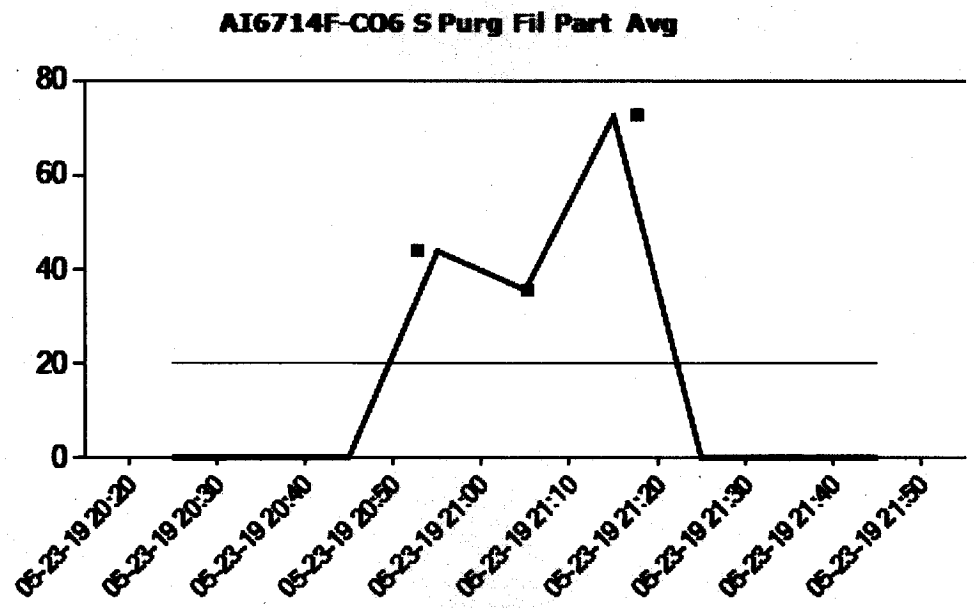
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5 W/S Purge Filter, 5/23/2019, 10:45 – 10:55; Filter leak, plugged filter, pulled and cleaned the probe



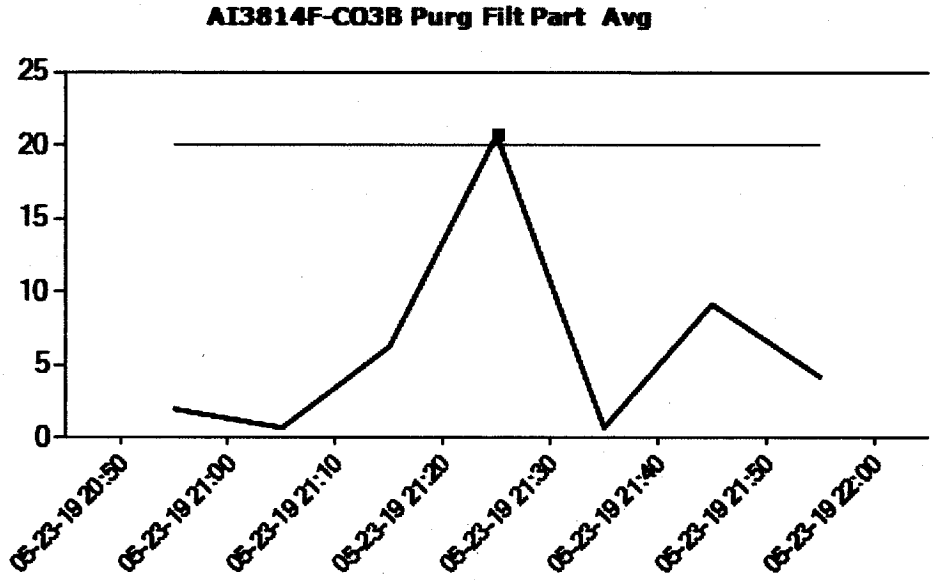
CO-6 S Purge Filter, 5/23/2019, 20:55 – 21:25; Sudden spike, pulled and cleaned the probe



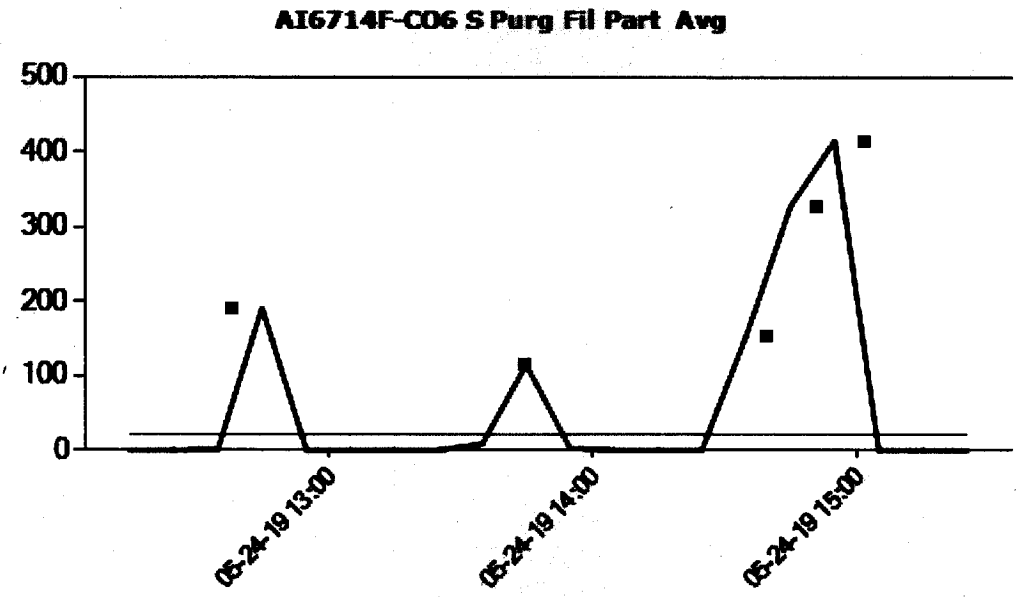
CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-3B Purge Filter, 5/23/2019, 21:25 – 21:35; Pulled and cleaned the probe



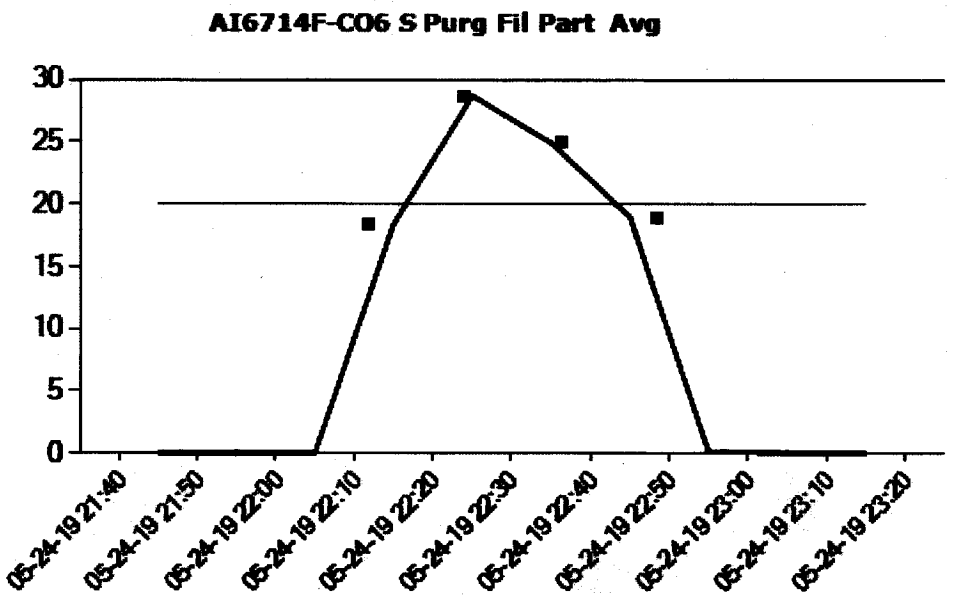
CO-6 S Purge Filter, 5/24/2019, 12:45 – 15:05; Technical difficulties with probe, I&E serviced the probe



CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-6 S Purge Filter, 5/24/2019, 22:15 – 22:55; Pulled and cleaned the probe



Plant-wide outage took place from May 26, 2019 to June 27, 2019. All units were down during this period.

CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

ATTACHMENT 2

EXPLANATION OF PERIODS OF PM EARLY WARNING SYSTEM DOWNTIME

CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

PMEWS Data Availability Detail: 01-Jan-2019 to 30-Jun-2019

CABOT

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
CO-3A	Dryer - North	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Dryer - South	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	MUF	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	MUF	29-May-2019 13:52	29-May-2019 14:09	0.28	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	Process Filter	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Purge Filter	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Purge Filter	26-Apr-2019 06:13	26-Apr-2019 06:14	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	MUF	22-Jan-2019 19:24	22-Jan-2019 20:35	1.18	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	MUF	22-Jan-2019 22:00	22-Jan-2019 22:02	0.03	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	MUF	22-Jan-2019 23:02	22-Jan-2019 23:03	0.02	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	MUF	23-Jan-2019 05:03	23-Jan-2019 05:47	0.73	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-3B	MUF	29-May-2019 13:52	29-May-2019 14:09	0.28	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Purge Filter	03-Jan-2019 22:52	04-Jan-2019 00:00	1.13	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Purge Filter	04-Jan-2019 00:00	04-Jan-2019 00:23	0.38	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Purge Filter	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Purge Filter	18-May-2019 17:37	18-May-2019 19:08	1.52	SelfTest	128	Clean Probe (Short CircuitFault)	Y

CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CO-5	Process Filter	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Purge Filter - North	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Dryer - North	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Dryer - South	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	MUF	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Process Filter	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Purge Filter - North	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Purge Filter - North	24-Jan-2019 05:27	24-Jan-2019 06:59	1.53	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Purge Filter - North	26-Jun-2019 08:03	26-Jun-2019 14:18	6.25	General	16	No Response from Sensor	Y
CO-6	Purge Filter - North	26-Jun-2019 14:20	26-Jun-2019 14:47	0.45	General	16	No Response from Sensor	Y
CO-6	Purge Filter - North	26-Jun-2019 14:56	26-Jun-2019 14:57	0.02	General	16	No Response from Sensor	Y
CO-6	Purge Filter - North	29-Jun-2019 18:17	29-Jun-2019 19:50	1.55	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Purge Filter - South	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Purge Filter - South	28-Mar-2019 01:46	28-Mar-2019 01:47	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Purge Filter - South	26-Jun-2019 23:32	26-Jun-2019 23:33	0.02	General	16	No Response from Sensor	Y
CS-1	MUF	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CS-1	Process Filter	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y

CANAL PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

CS-1	Process Filter	06-May-2019 09:39	06-May-2019 13:52	4.22	General	16	No Response from Sensor	Y
CS-2	MUF	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	MUF	06-Jun-2019 13:52	06-Jun-2019 14:14	0.37	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-2	Process Filter	04-Jan-2019 10:19	04-Jan-2019 10:21	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	Purge Filter	21-Mar-2019 08:44	21-Mar-2019 10:15	1.52	SelfTest	128	Clean Probe (Short CircuitFault)	Y

Plant-wide outage took place from May 26, 2019 to June 27, 2019. All units were down during this period.

CABOT CORPORATION
USEPA-LDEQ-CABOT CONSENT DECREE
SEMIANNUAL COMPLIANCE REPORT

PAMPA PLANT

REPORTING PERIOD: January 1, 2019– June 30, 2019

a. A description of the construction of the Control Technologies, CEMS, and PM Early Warning Systems required by this Consent Decree, including:

i. If construction is not underway, any available information concerning the construction schedule and the execution of major contracts.

Construction is complete at the site, operational shake-down tests of the systems began in October 2016 with the unit achieving compliance with the EPA Consent Decree emission limits on March 15, 2017.

ii. Construction Schedule:

Construction of the control systems and CEMs are complete.

iii. If construction is underway, the estimated percent of installation as of the end of the reporting period, the current estimated construction completion date, and a brief description of completion of significant milestones during the reporting period.

Final construction was completed on 11/23/16.

iv. Any information indicating that installation and commencement of operation may be delayed, including the nature and cause of the delay.

Consistent with the provisions of the Consent Decree, construction activity was completed, and shakedown testing began in October 2016. The unit has been placed in service but is still undergoing troubleshooting to demonstrate continuous compliance with TCEQ permit limits.

v. Once construction is complete, provide the dates the equipment was placed in service and/or commenced Continuous Operation and the dates of any testing that was performance during the period.

On November 8, 2017, Cabot notified the US Environmental Protection Agency of a Force Majeure event affecting the operation of the SCR.

On May 1, 2018, Cabot requested an extension to the Force Majeure that was originally requested on November 8, 2017.

b. All information necessary to demonstrate compliance with all applicable Emissions Limits, 30-day Rolling Average Sulfur Content Weight Percent, 365-day Rolling Average Sulfur Content Weight Percent, and other provisions in Sections VI (SO_2 Control Technology, Emissions Limits, and Monitoring Requirements), VII (NOx Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements)

- *Paragraph 22, Feedstock Sulfur Content Monitoring Requirements.*

On December 31, 2014, Cabot instituted feedstock sulfur monitoring, as required by Section VI, Paragraph 22 pursuant to the terms of the Consent Decree to demonstrate compliance with the 30-day rolling average sulfur content weight percent as required by Paragraph 21. The supporting documentation is provided in Attachment 1.

Cabot continues to monitor its 365-day rolling average of the feedstock sulfur content weight percent during the reporting period. During this period, the 365-day rolling average feedstock sulfur content weight percent remained in full compliance with the limitations set in Section VI, Paragraph 21. The supporting documentation is provided in Attachment 1.

- *Paragraph 26 - NOx Process System Operation Emissions Limits and Control Technology*

The scope of work included the following major equipment:

- A high performance thermal oxidizer with a multi-stage burner system for the combined exhaust of ATUs GP-6 and GP-9;
- A SCR control system, to be installed in the flue gas streams of the ATU thermal oxidizers;
- A separate vent stack for the GP-9 casing gas stream and utilization of the existing GP-6 casing gas vent stack; and,
- A single vent stack downstream of the SCR.

The performance of the system meets the requirements of the Consent Decree.

- *Paragraph 32 and Appendix B - Other PM Control Requirements*

During the reporting period, Cabot achieved and maintained compliance with the requirements of Paragraph 32 and Appendix B the Consent Decree relative to particulate matter ("PM") control requirements. More specifically, for each PM emissions equipment unit:

- Cabot employed the relevant PM reduction mechanism and method for managing PM emissions specified in Appendix B of the Consent Decree.
- Cabot completed the relevant daily visual assessments, and maintained a record of the results of each such assessment.
- Cabot did not observe visible emissions as a result of any of the daily visual assessments during the reporting period. Accordingly, Cabot was not required during this reporting period to perform any six-minute Method 9 evaluation in response to an observation of visible emissions during the required daily visual assessments.

- *Paragraph 33 and Appendix C - Particulate Emissions Best Management Practices Control Plan*

Cabot implemented the Particulate Emissions Best Management Practices Control Plan set forth in Appendix C of the Consent Decree, to the extent required during the reporting period.

- *Paragraph 34 and Appendix D - PM Early Warning System*

Pursuant to the conditions of the Consent Decree, Cabot initiated compliance with applicable requirements of the Consent Decree related to the PM Early Warning System on March 11, 2015. During the reporting period, Cabot operated each PM Early Warning System at all times on Heat Load and Process System Operation, except during system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments of the applicable system, for each particulate monitor.

During the reporting period, Cabot achieved a data availability of greater than 95% based on a quarterly average

of the operating time of the emission unit or activity being monitored, and therefore, achieved full compliance with the minimum degree of availability requirements of the Consent Decree. In addition, in response to any alarm triggered during the reporting period for any PM Early Warning System at the facility, Cabot investigated the cause of the alarm as expeditiously as practicable and performed the required sequence of tasks to respond to the alarm.

On each Operating Day in this reporting period, Cabot conducted a visual review of the recorded data for each PM Early Warning System to identify trends in relative PM emissions.

Cabot also conducted routine maintenance during the reporting period in accordance with manufacturer's recommendations as addressed within the provisions in Paragraphs D.8a and D.8b of the Consent Decree.

c. All data collected for each Pampa Process System, from the time any 30-day Rolling Average Sulfur Content Weight Percent and/or 365-day Rolling Average Sulfur Content Weight Percent is exceeded until compliance is achieved, and an explanation of any periods of downtime of any relevant equipment that prohibited the collection of such data.

During the reporting period, there were no periods of exceedance of the 30-day and/or 365-day rolling average sulfur content weight percent.

d. All CEMS data collected for each Process System, from the time any Emissions Limit in Sections VI (SO_2 Control Technology, Emissions Limits, and Monitoring Requirements) and VII (NOx Control Technology, Emissions Limits, and Monitoring Requirements) is exceeded until compliance is achieved, and an explanation of any periods of downtime of such CEMS.

- *Paragraph 29 - NOx Monitoring Requirements*

During the reporting period, the CEMS had 11 hours of downtime. There were no excess emissions events.

f. All PM Early Warning System data collected, from the time a PM Early Warning System alarm is triggered until the PM Early Warning System data have returned to normal operating ranges, below levels triggering an alarm condition, and an explanation of any periods of PM Early Warning System downtime

Data collected for each event in which a PM Early Warning System alarm was triggered during this reporting period is presented in Attachment 2.

A summary of the periods of PM Early Warning System downtime, providing the required explanation for each such period, is presented in Attachment 3.

g. A description of any violation of the requirements of this Consent Decree, including any violation resulting from Malfunctions, any exceedance of an Emissions Limit, any exceedance of a 30-day rolling Average Sulfur Content Weight Percent or 365-day Rolling Average Weight Percent, or any failure to install, commence operation or Continuously Operate and Control Technology or any PM Early Warning System, which includes:

i. the date and duration of, and the quantity of any emissions related to, the violation;

ii. a full explanation of the primary root cause and any other significant contributing cause(s) of the violation;

iii. a root cause analysis of all reasonable interim and long-term remedial steps or corrective actions, including all design, operation, and maintenance changes consistent with good engineering practices, if any, that could be taken to reduce or eliminate the probability of recurrence of such violation, and, if not already completed, a schedule for its (their) implementation, or, if Defendant concludes that remedial steps or corrective actions should not be conducted, the basis for that conclusion.

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

If no violations occurred during a reporting period, a statement that no violations occurred

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

h. A description of the status of any permit applications and any proposed SIP revisions required under this Consent Decree

Cabot filed a Standard Permit Application with the TCEQ, dated November 16, 2015 for the construction and operation of the pollution control equipment required by the Consent Decree for the Pampa Plant. Additional information was provided to the TCEQ during the review period. The permit for the project was issued by TCEQ on January 6, 2016, Standard Permit Registration Number 137239.

A revision was made to Standard Permit 137239 to relocate EPN 12D, GP9 ATU Dryer Vent on June 22, 2018. Release parameters were updated and/or corrected. The revision did not result in any changes to actual or permitted emissions from this source.

i. A summary of all actions undertaken and Project Dollars expended during the reporting period, as well as any cumulative Project Dollars expended, and the estimated environmental benefits achieved to date in satisfaction of the requirements of Section V (Environmental Mitigation) and Appendix A.

The project certification for these projects was submitted to the EPA on September 9, 2014 by Cabot.

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PAMPA PLANT

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ATTACHMENT 1

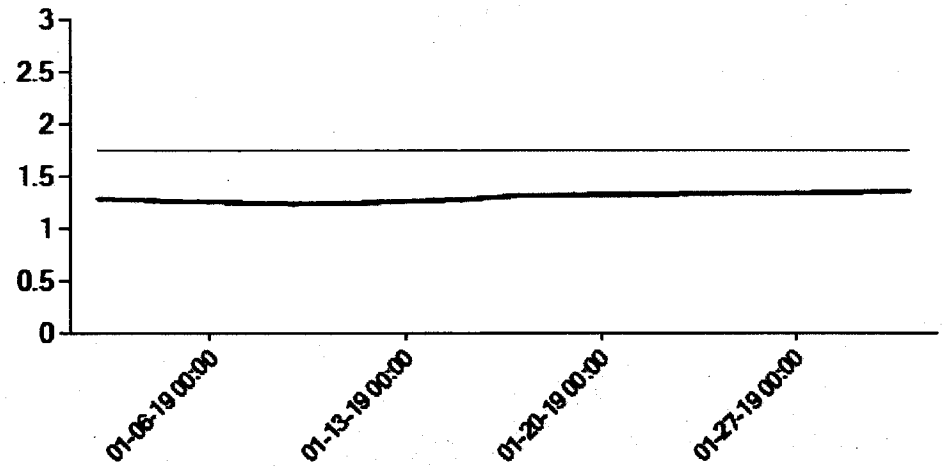
FEEDSTOCK SULFUR 30-DAY ROLLING AVERAGE AND 365-DAY ROLLING AVERAGE COMPLIANCE TRACKING DATA

PAMPA PLANT

REPORTING PERIOD: January 1, 2019– June 30, 2019

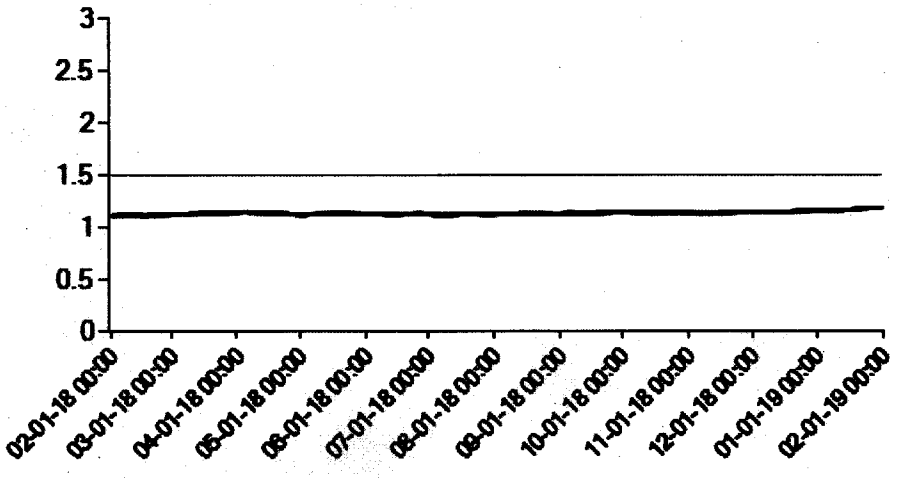
January

Plantwide 30-day Rolling Average Sulfur Content Weight Percent



30-day Rolling Average = 1.3635% (02-Jan-19 thru 31-Jan-19)

Plantwide 365-day Rolling Average Sulfur Content Weight Percent



365-day Rolling Average = 1.1889% (01-Feb-18 thru 31-Jan-19)

PAMPA PLANT

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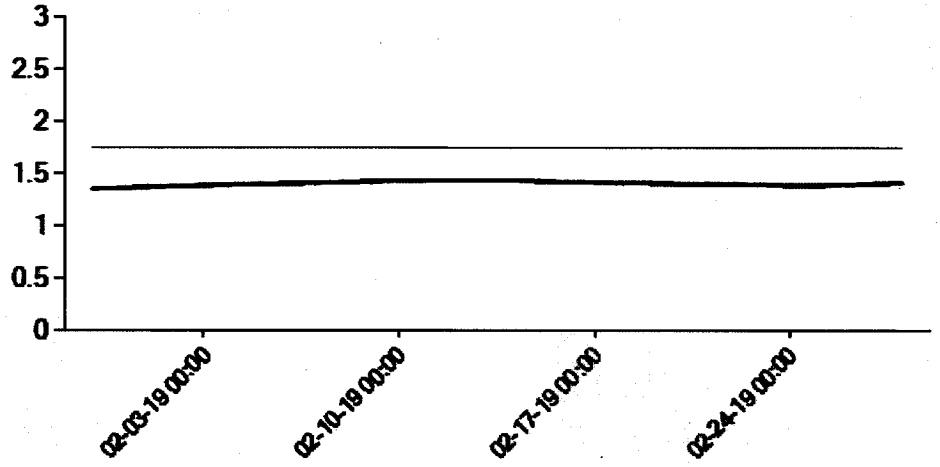
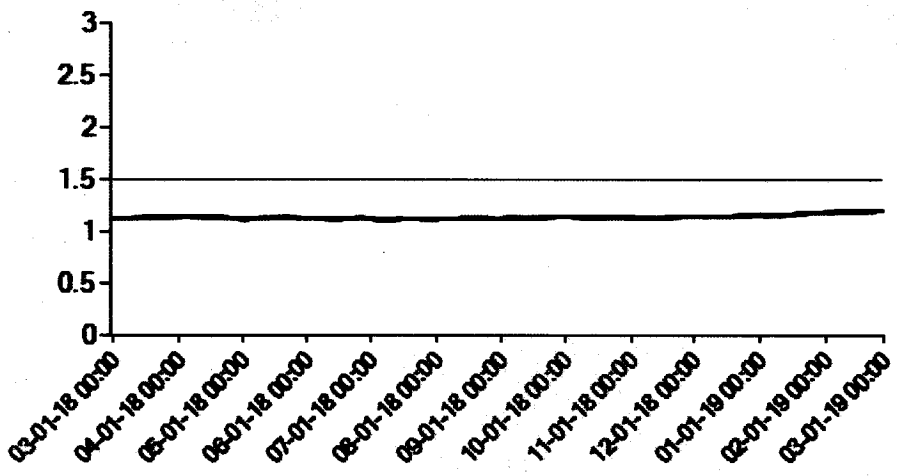
February

Plantwide 30-day Rolling Average Sulfur Content Weight Percent



30-day Rolling Average = 1.4131% (30-Jan-19 thru 28-Feb-19)

Plantwide 365-day Rolling Average Sulfur Content Weight Percent



365-day Rolling Average = 1.2043% (01-Mar-18 thru 28-Feb-19)

PAMPA PLANT

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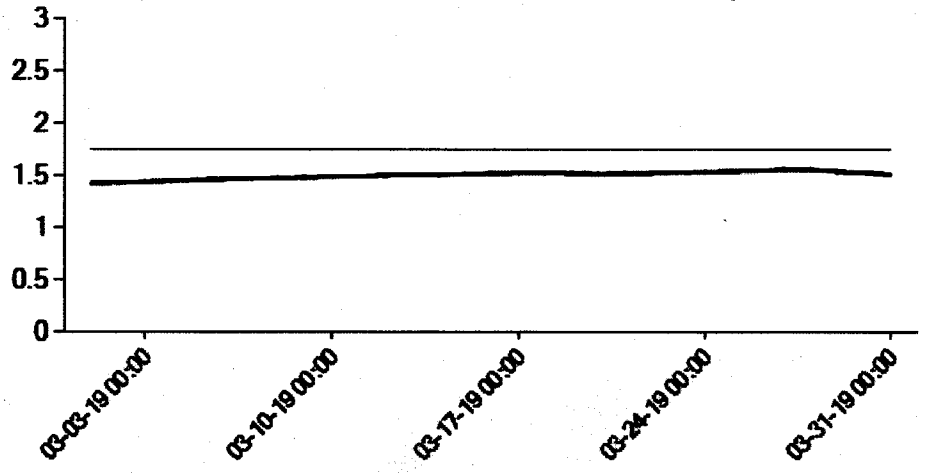
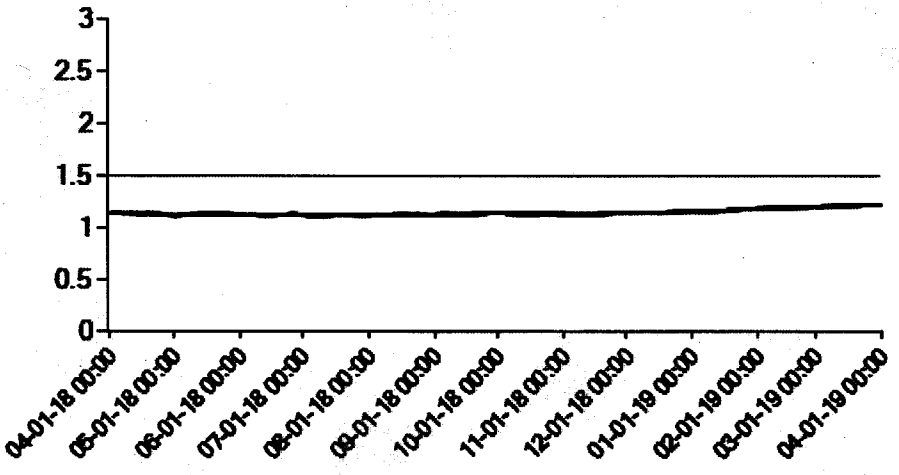
March

Plantwide 30-day Rolling Average Sulfur Content Weight Percent



30-day Rolling Average = 1.5167% (01-Mar-19 thru 31-Mar-19)

Plantwide 365-day Rolling Average Sulfur Content Weight Percent



365-day Rolling Average = 1.2261% (01-Apr-18 thru 31-Mar-19)

PAMPA PLANT

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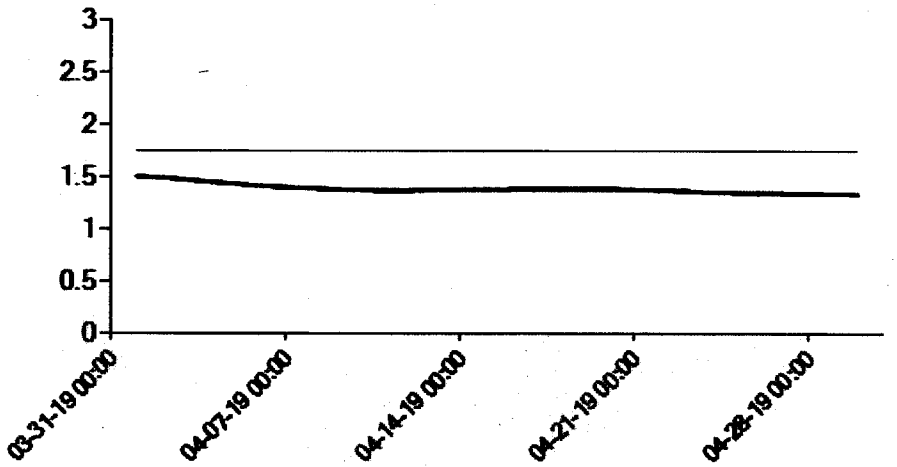
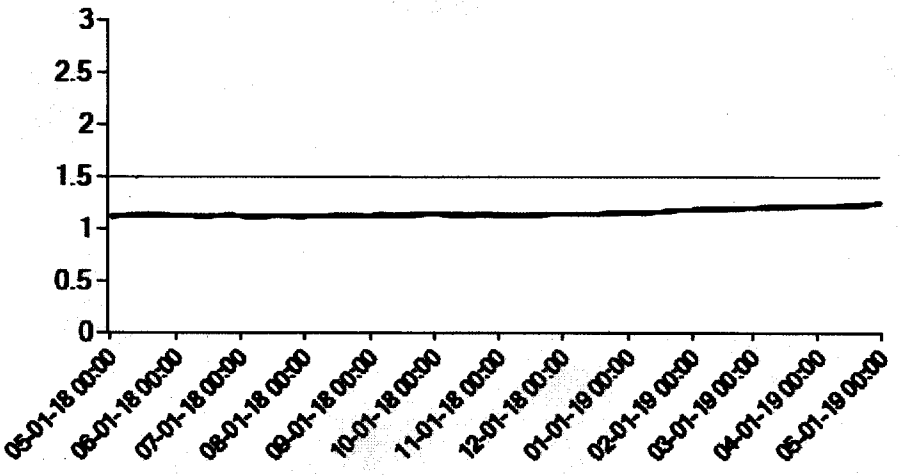
April

Plantwide 30-day Rolling Average Sulfur Content Weight Percent



30-day Rolling Average = 1.3362% (01-Apr-19 thru 30-Apr-19)

Plantwide 365-day Rolling Average Sulfur Content Weight Percent



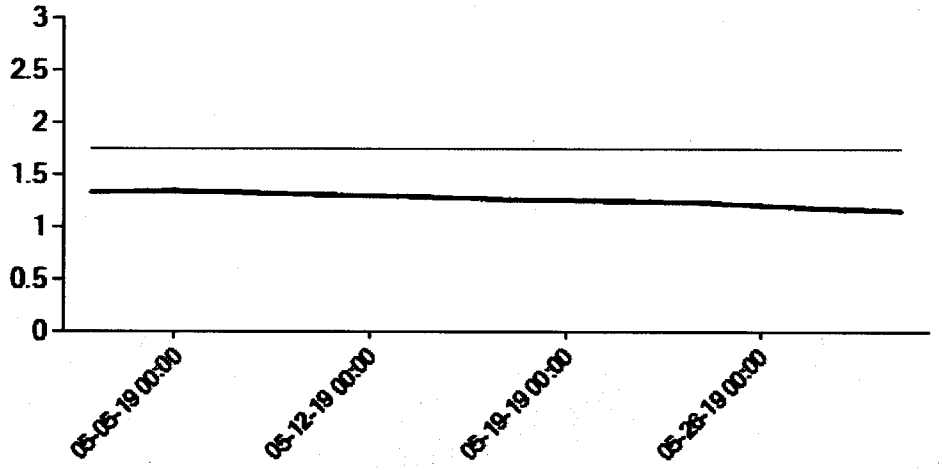
365-day Rolling Average = 1.2532% (01-May-18 thru 30-Apr-19)

May

PAMPA PLANT

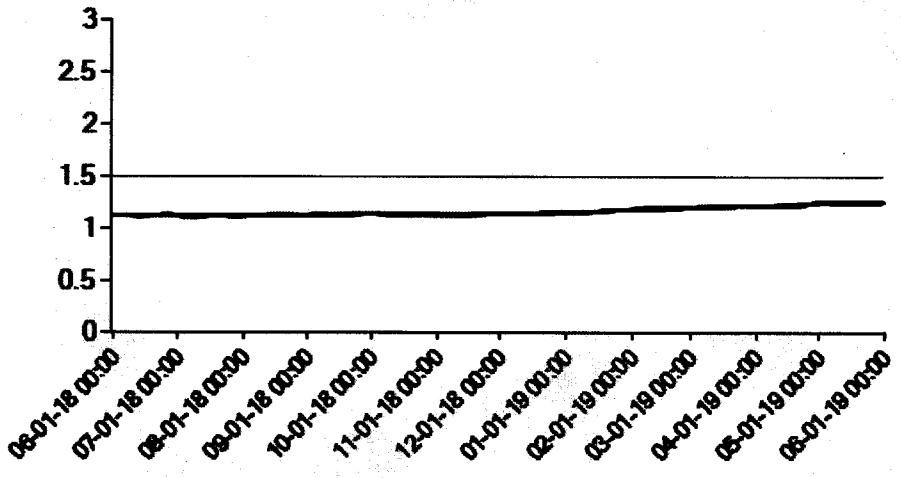
REPORTING PERIOD: January 1, 2019– June 30, 2019

Plantwide 30-day Rolling Average Sulfur Content Weight Percent



30-day Rolling Average = 1.1591% (02-May-19 thru 31-May-19)

Plantwide 365-day Rolling Average Sulfur Content Weight Percent



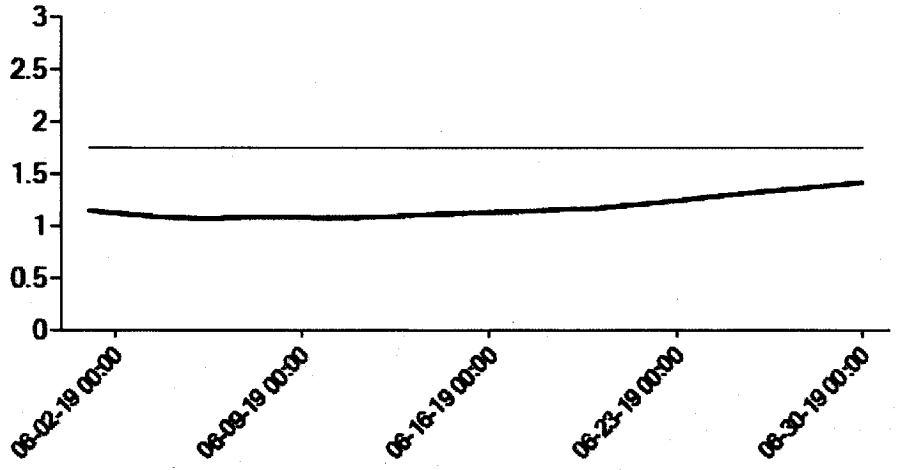
365-day Rolling Average = 1.2578% (01-Jun-18 thru 31-May-19)

PAMPA PLANT

REPORTING PERIOD: January 1, 2019– June 30, 2019

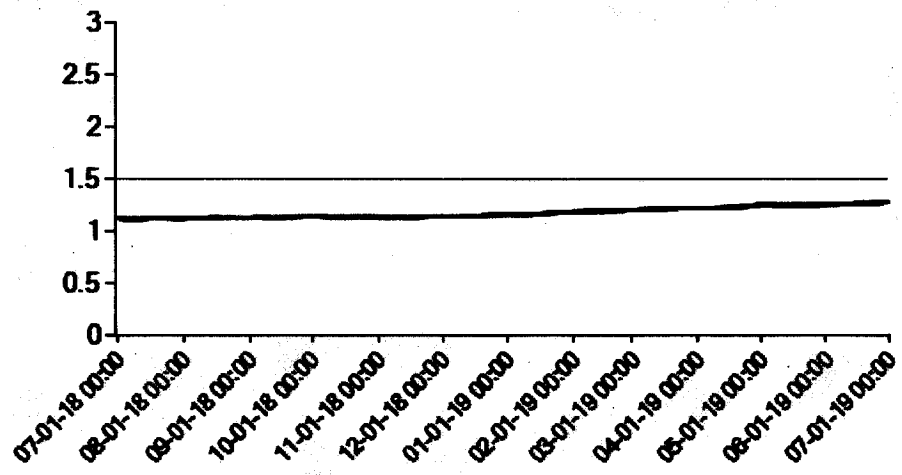
June

Plantwide 30-day Rolling Average Sulfur Content Weight Percent



30-day Rolling Average = 1.4220% (01-Jun-19 thru 30-Jun-19)

Plantwide 365-day Rolling Average Sulfur Content Weight Percent



365-day Rolling Average = 1.2833% (01-Jul-18 thru 30-Jun-19)

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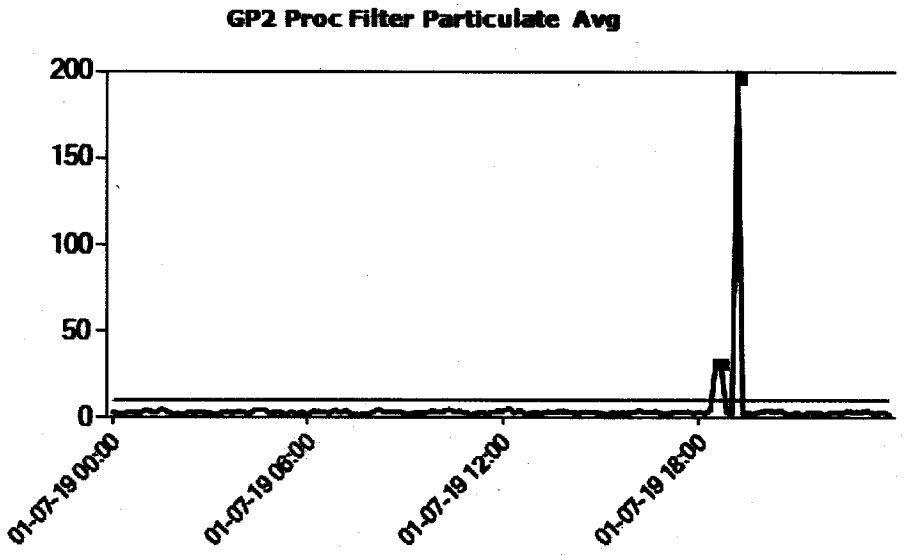
ATTACHMENT 2

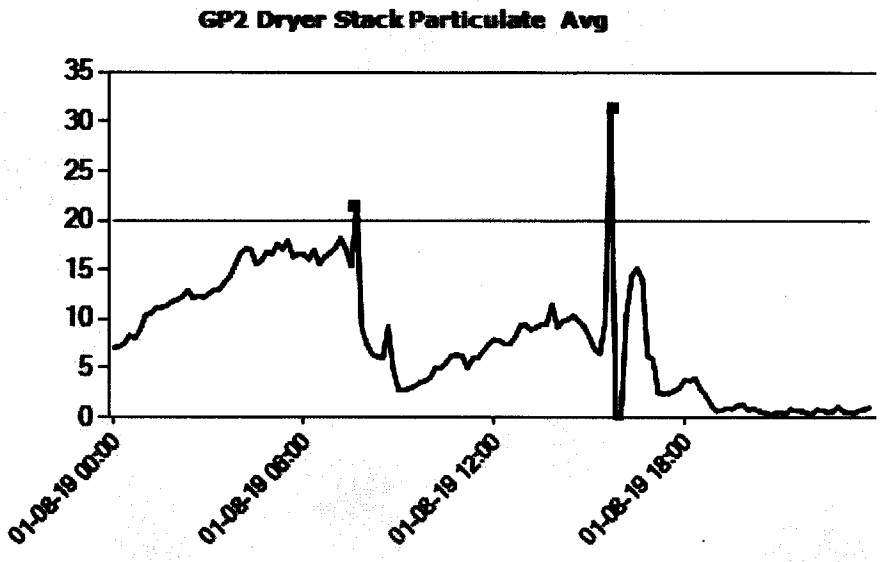
PM EARLY WARNING SYSTEM DATA COLLECTED DURING HIGH PM EMISSIONS EVENTS

PAMPA PLANT

REPORTING PERIOD: **January 1, 2019– June 30, 2019**



Unit: GP2 Process Filter
Date: January 7th 6:30 PM- 7:20 PM
Description: Dirty particulate monitor



Unit: GP2 Dryer Stack
Date: January 8th 7:40 AM- 7:50 AM
Description: Cleaning particulate monitor.

PAMPA PLANT

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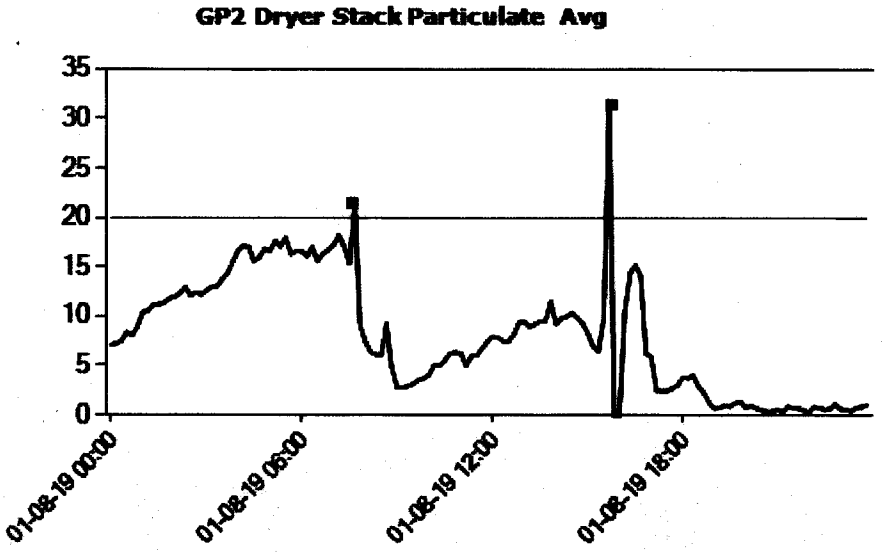
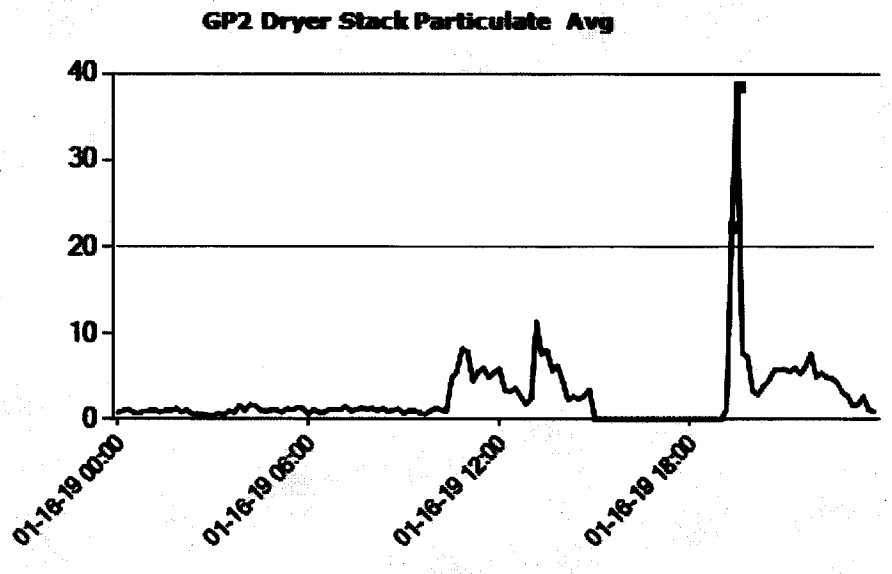


Unit: GP-2 Dryer Stack
Date: January 8th 3:40 PM- 3:50 PM
Description: Starting up additional reactor.



Unit: GP-2 Dryer Stack
Date: January 16th 7:20 PM- 7:40 PM
Description: Reactors being transitioned from heatload to makeload.

PAMPA PLANT

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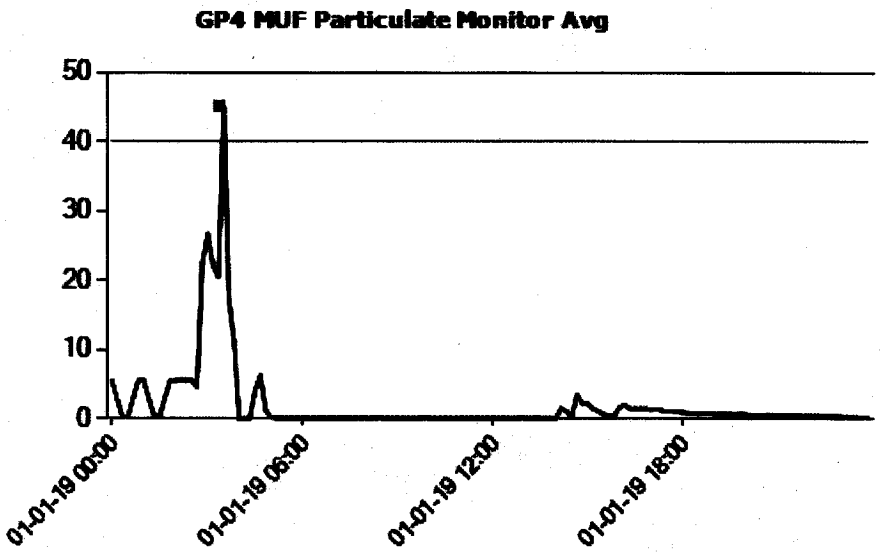
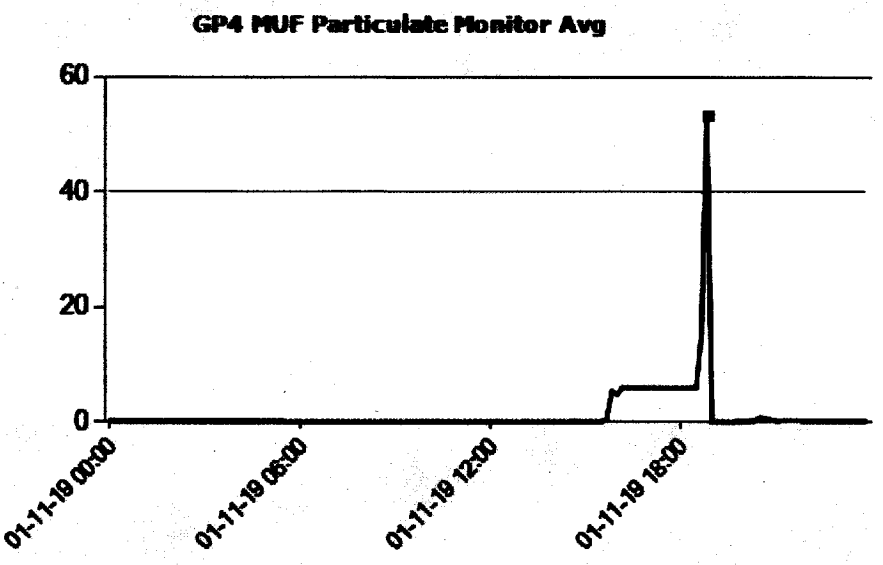


Unit: GP-4 MUF
Date: January 1st 3:30 AM- 3:40 AM
Description: High moisture from heating up



Unit: GP-4 MUF
Date: January 11th 6:50 PM- 7:00 PM
Description: Heating up the MUF

PAMPA PLANT

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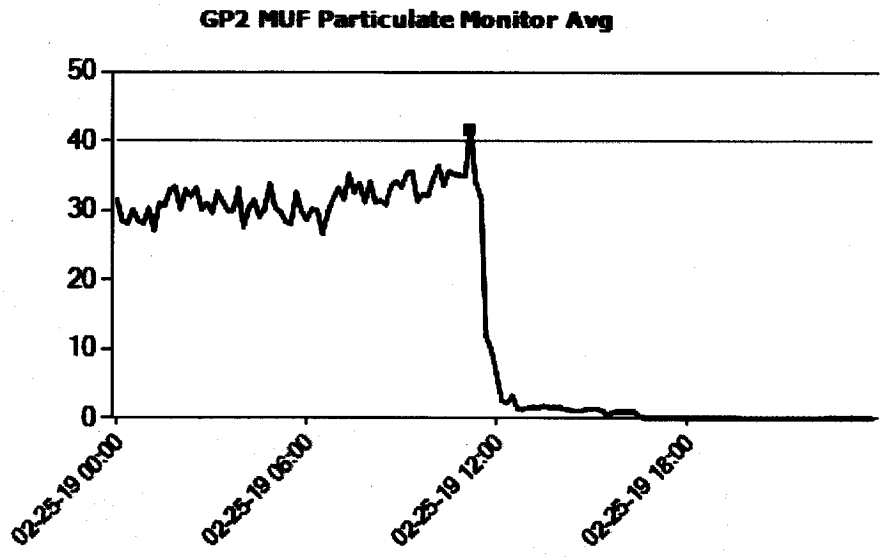
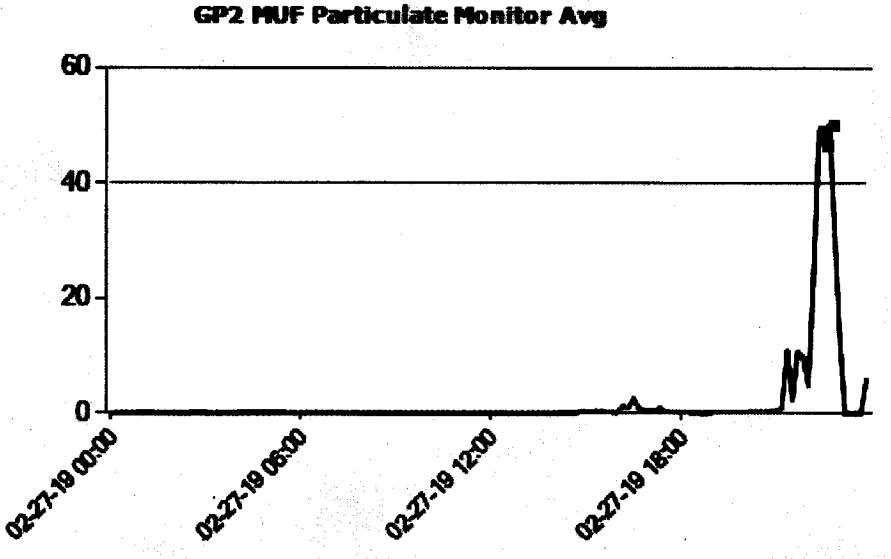


Unit: GP-2 MUF
Date: February 25th 11:10 AM- 11:20 AM
Description: Cooling down for MUF work



Unit: GP-2 MUF
Date: February 27th 10:20 PM- 2:30 AM
Description: Took unit to heatload; dirty particulate monitor

PAMPA PLANT

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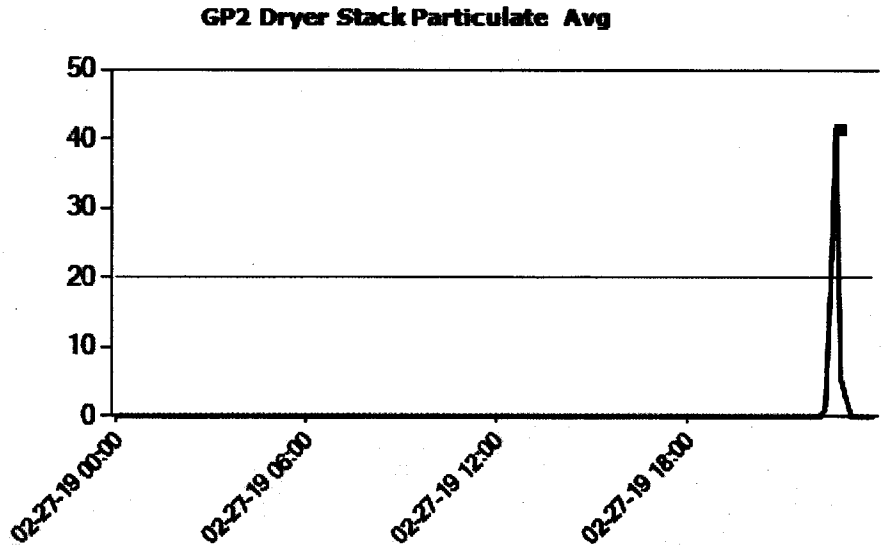
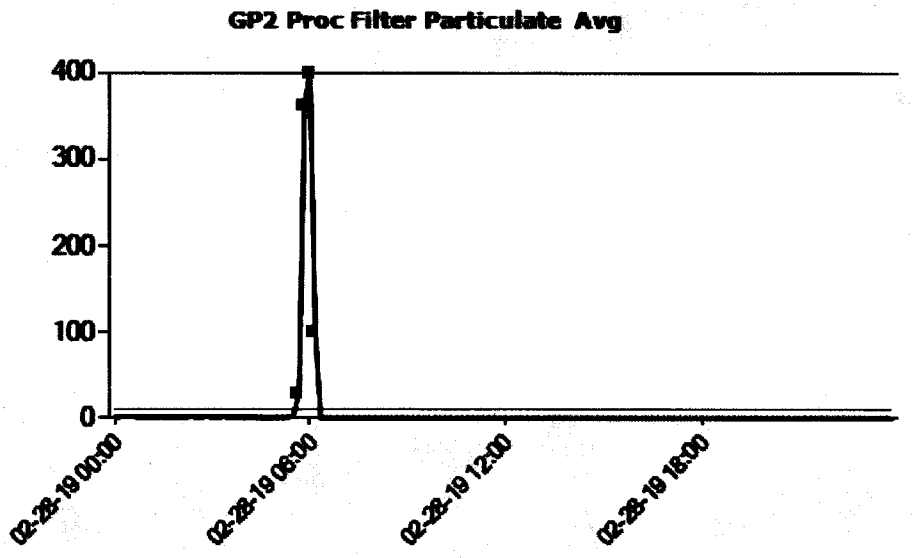


Unit: GP-2 Dryer Stack
Date: February 27th 10:40 PM-10:50 PM
Description: Startup of dryers



Unit: GP-2 Process Filter
Date: February 28th 5:40AM-6:20AM
Description: Unit shutting down for maintenance work

PAMPA PLANT

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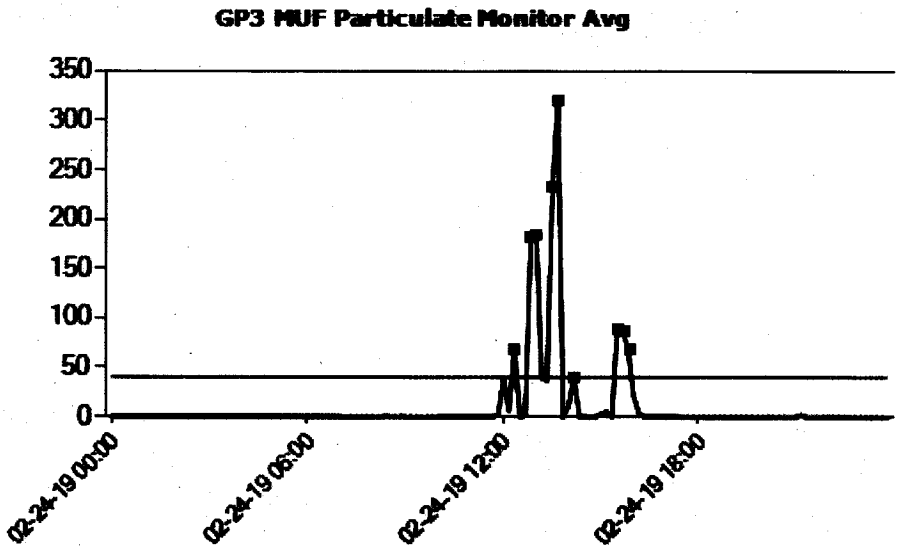
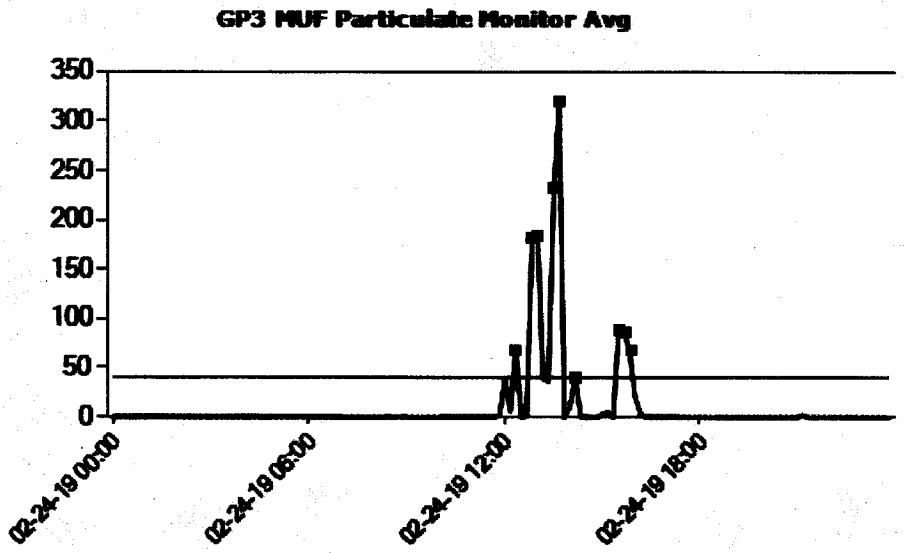


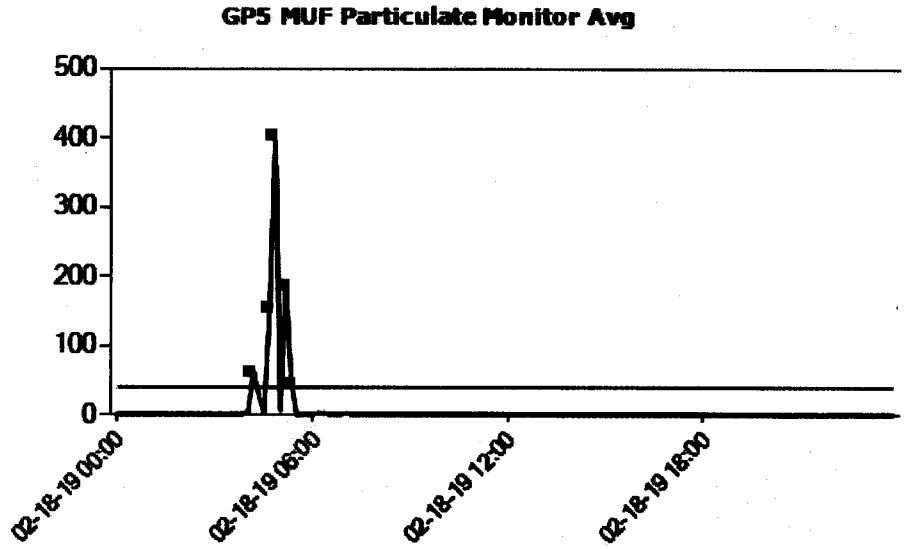
Unit: GP-3 MUF
Date: February 24th 12:20PM-1:10PM; 1:30 PM- 3:40 PM
Description: Unit on heatload; cooling down the MUF



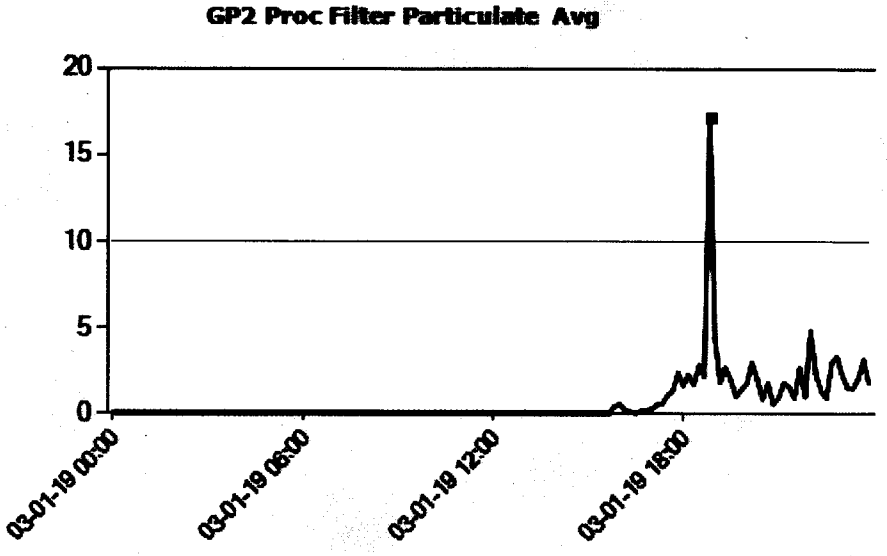
Unit: GP-3 MUF
Date: February 24th 3:40 PM- February 25th 9:30 AM
Description: Unit transitioning from heatload to makeload

PAMPA PLANT

REPORTING PERIOD: January 1, 2019– June 30, 2019



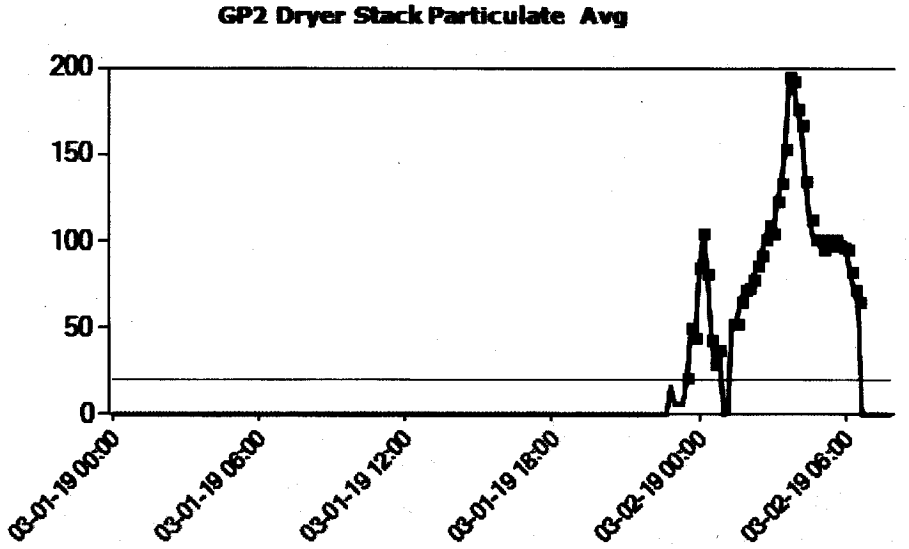
Unit: GP-5 MUF
Date: February 18th 4:10AM- 5:30 AM
Description: Operator increased high pressure air to clean particulate monitor



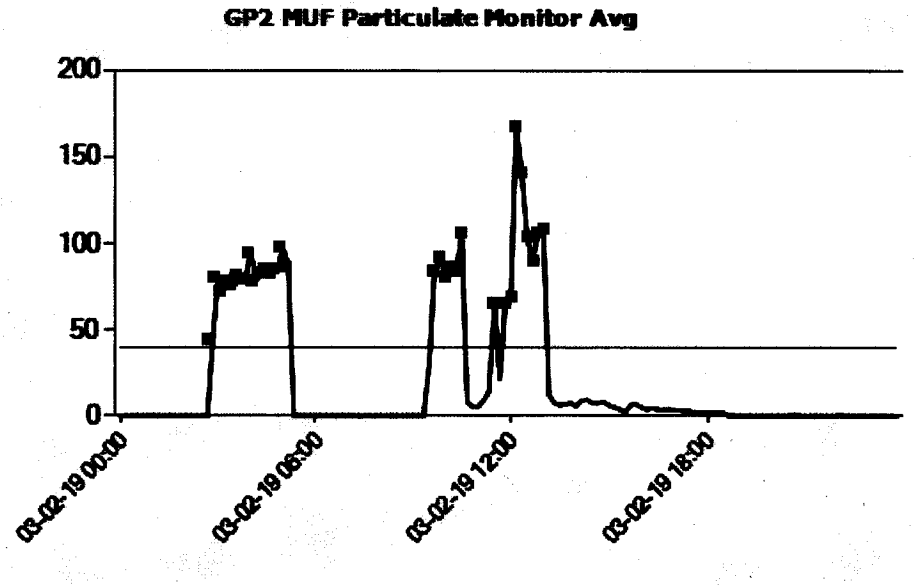
Unit: GP-2 Process Filter
Date: March 1st 6:50 PM- 7:00 PM
Description: Unit starting up

PAMPA PLANT

REPORTING PERIOD: **January 1, 2019– June 30, 2019**



Unit: GP-2 Dryer Stack
Date: March 1st 11:30 PM- March 2nd 6:40 AM
Description: Unit starting up



Unit: GP-2 MUF
Date: March 2nd 2:50 AM- 5:20 AM; 9:40 AM- 1:30 PM
Description: Unit starting up

PAMPA PLANT

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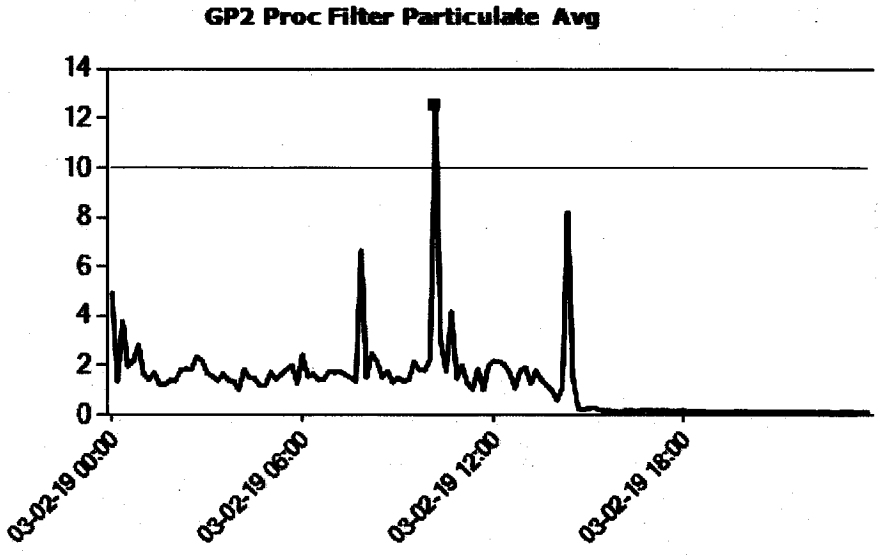
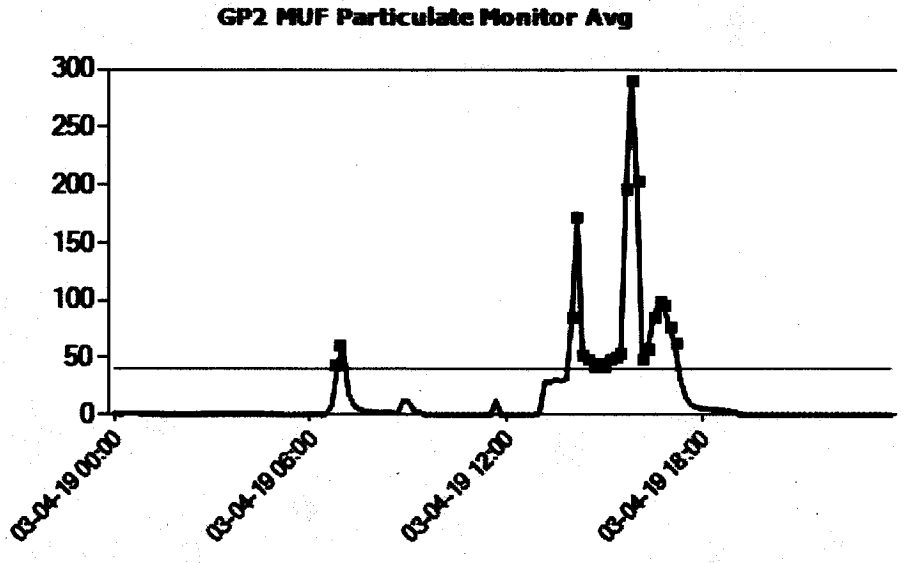


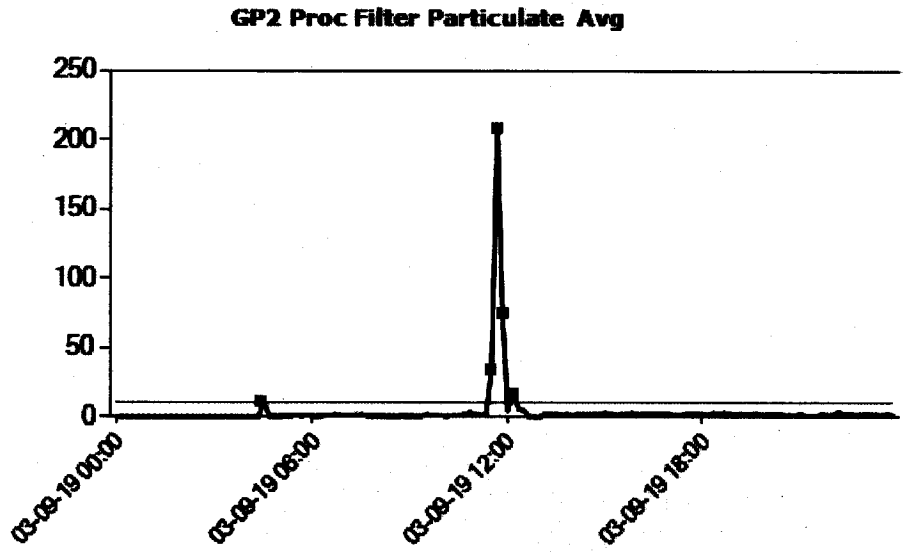
Unit: GP-2 Process Filter
Date: March 2nd 10:10 AM- 10:20AM
Description: Unit starting up



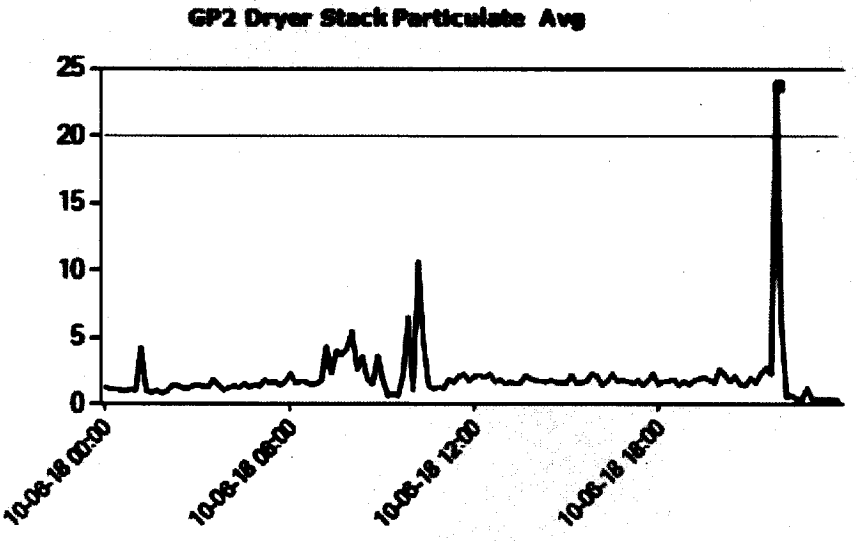
Unit: GP-2 MUF
Date: March 4th 2:00 PM-5:20 PM
Description: Cooling down the MUF. Maintenance on MUF compartments and/or poppits.

PAMPA PLANT

REPORTING PERIOD: **January 1, 2019– June 30, 2019**



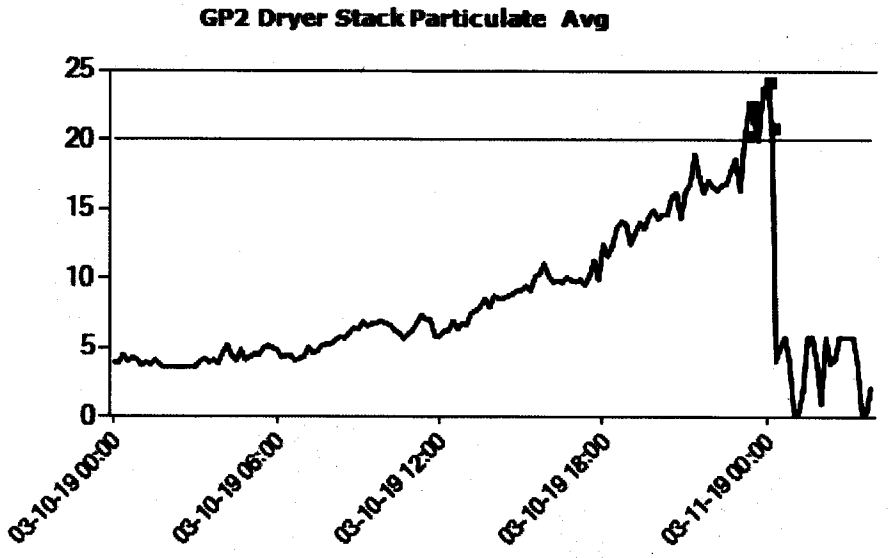
Unit: GP-2 Process Filter
Date: March 9th 4:30 AM- 4:40 AM; 11:30 AM- 12:20 PM
Description: Unit starting up; dirty monitor, maintenance called to clean



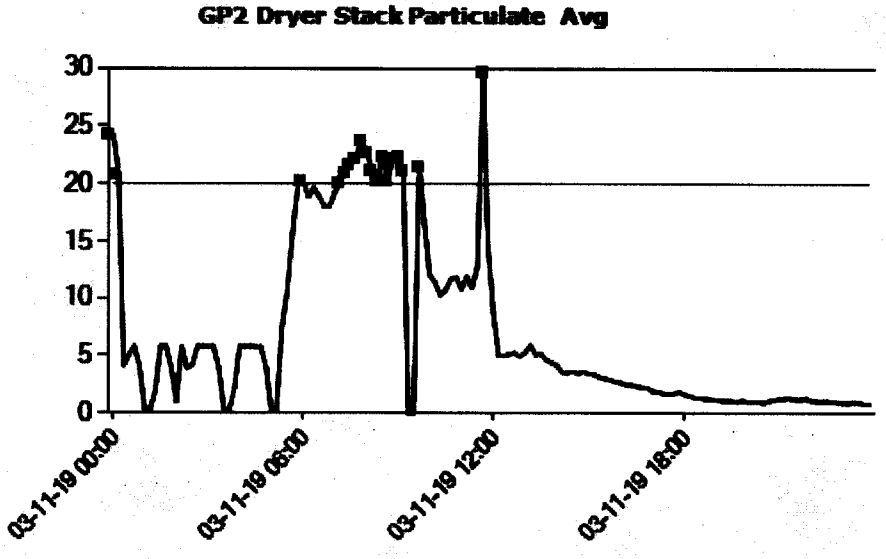
Unit: GP-2 Dryer Stack
Date: March 9th 8:50 AM- 09:10 AM; 12:10 PM-12:40 PM
Description: Unit starting up and maintenance cleaning monitors

PAMPA PLANT

REPORTING PERIOD: **January 1, 2019– June 30, 2019**



Unit: GP-2 Dryer Stack
Date: March 10th 11:10 PM- March 11th 12:20 AM
Description: Dirty PM monitor, maintenance called out to clean monitor and the alarm cleared



Unit: GP-2 Dryer Stack
Date: March 11th 6:00 AM- 11:40 AM
Description: Loose ground wire on particulate monitor giving false alarms. Maintenance called for repairs

PAMPA PLANT

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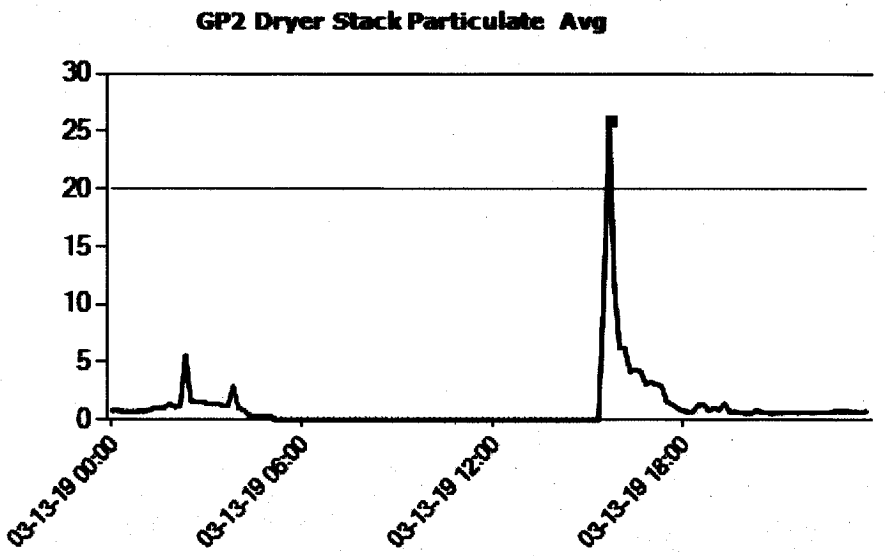
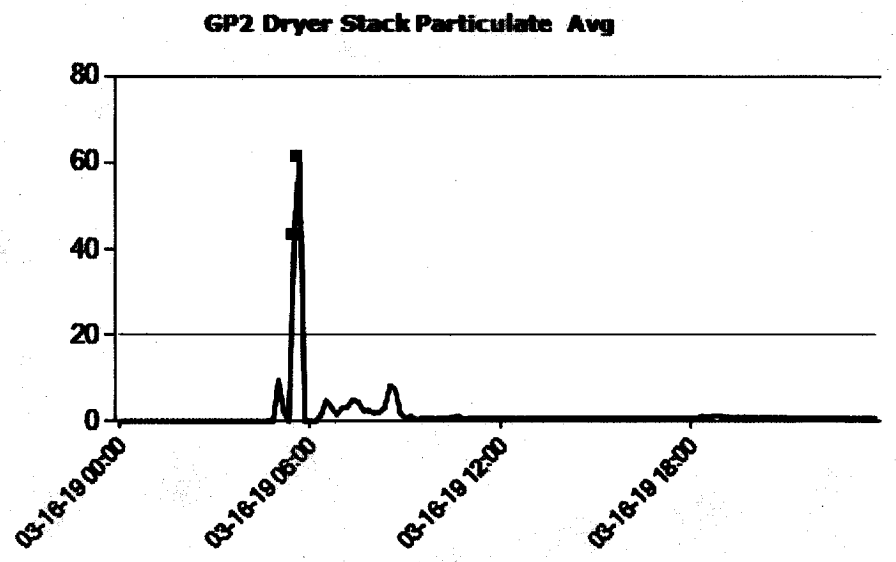


Unit: GP-2 Dryer Stack
Date: March 13th 3:40 PM- 3:50 PM
Description: Dryers in the process of heating up for makeload



Unit: GP-2 Dryer Stack
Date: March 16th 5:30 AM- 5:50 AM
Description: Starting unit up

PAMPA PLANT

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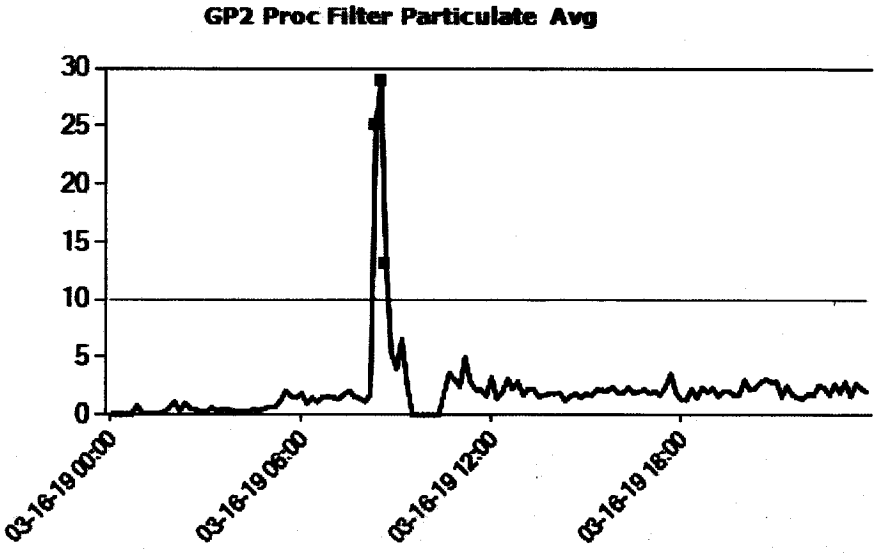
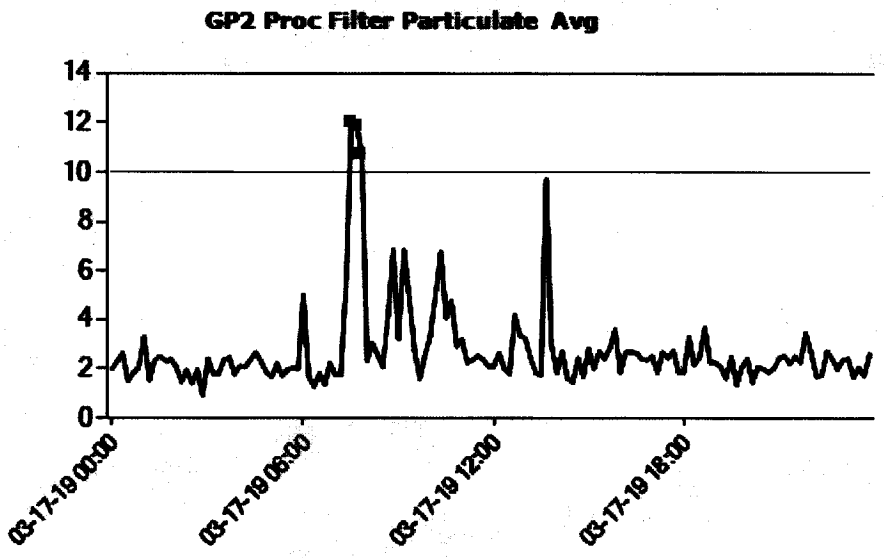


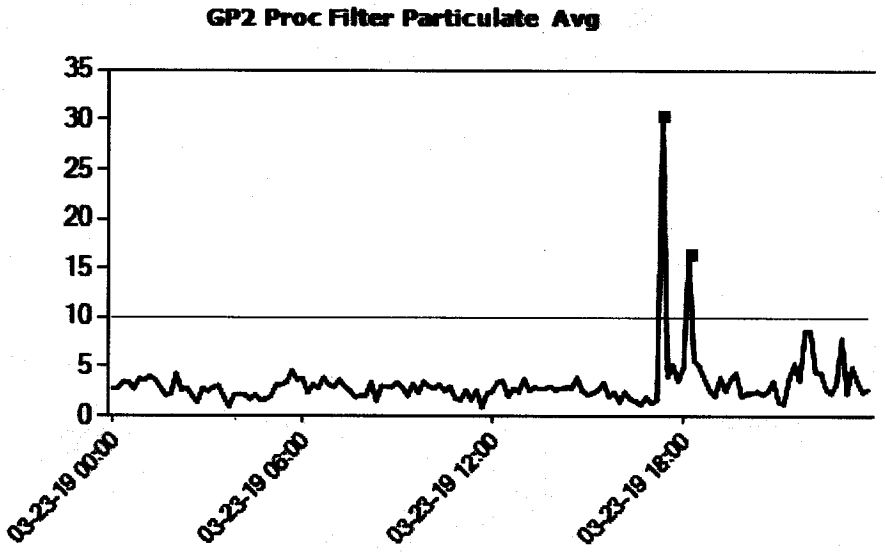
Unit: GP-2 Process Filter
Date: March 16th 8:20 AM-8:50 AM
Description: Starting unit up



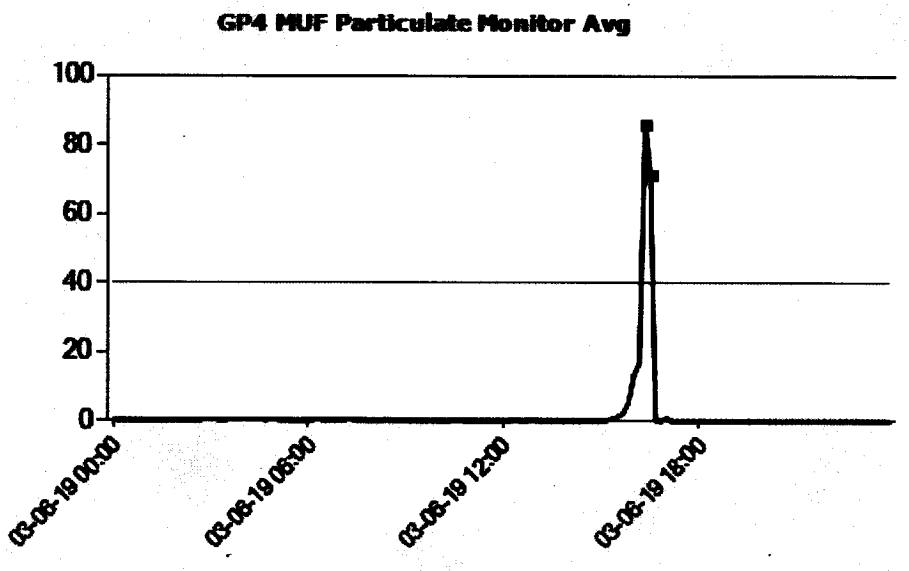
Unit: GP-2 Process Filter
Date: March 17th 7:30 AM- 8:00 AM
Description: Re-run slug during reprocessing

PAMPA PLANT

REPORTING PERIOD: **January 1, 2019– June 30, 2019**



Unit: GP-2 Process Filter
Date: March 23rd 5:20 PM- 6:20 PM
Description: Spike occurred while starting and/or stopping re-processing on GP2. Alarm cleared when unit reached steady state



Unit: GP-4 MUF
Date: March 6th 4:20 PM- 4:40 PM
Description: Unit going down cold

PAMPA PLANT

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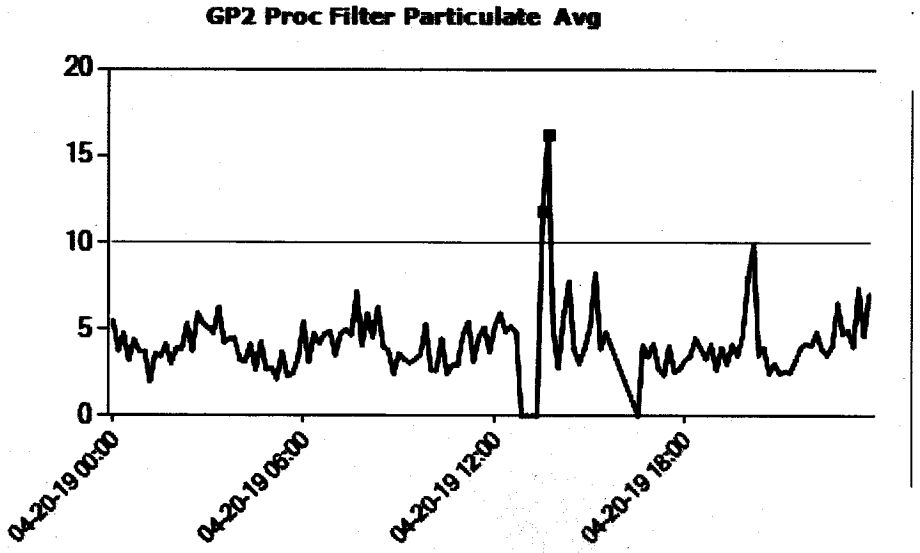
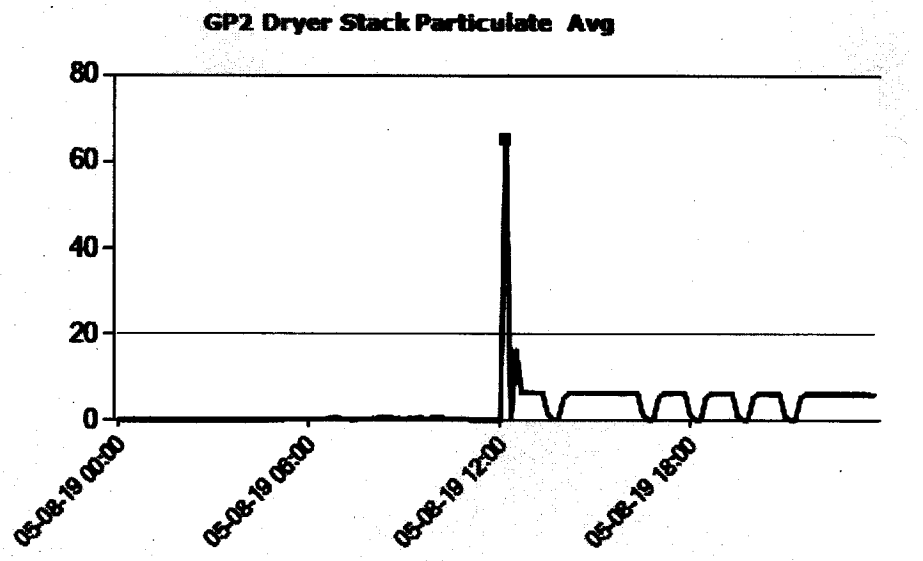


Unit: GP-2 Process Filter
Date: April 20th 1:30PM-1:50PM
Description: Unit tripped due to power outage



Unit: GP-2 Dryer Stack
Date: May 8th 12:10 PM- 12:20 PM
Description: Switched from tail gas to natural gas for grade change

PAMPA PLANT

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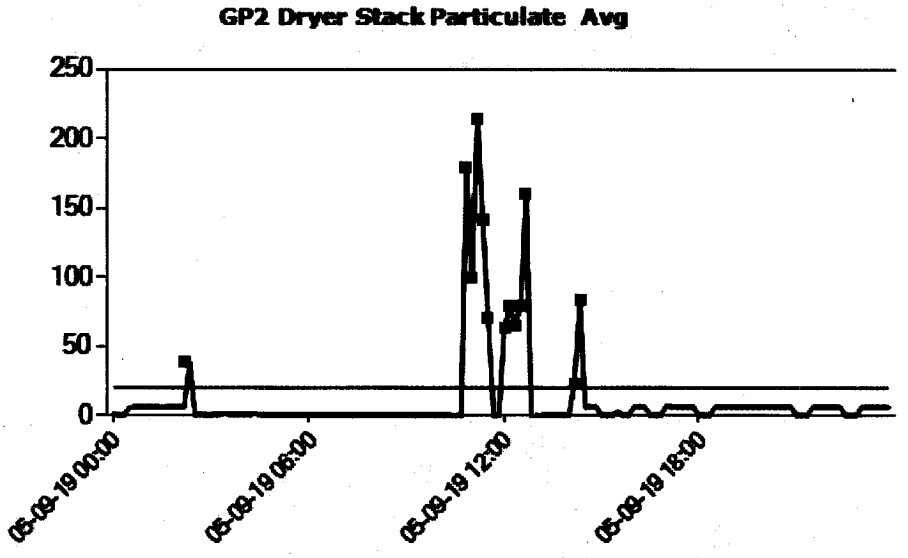
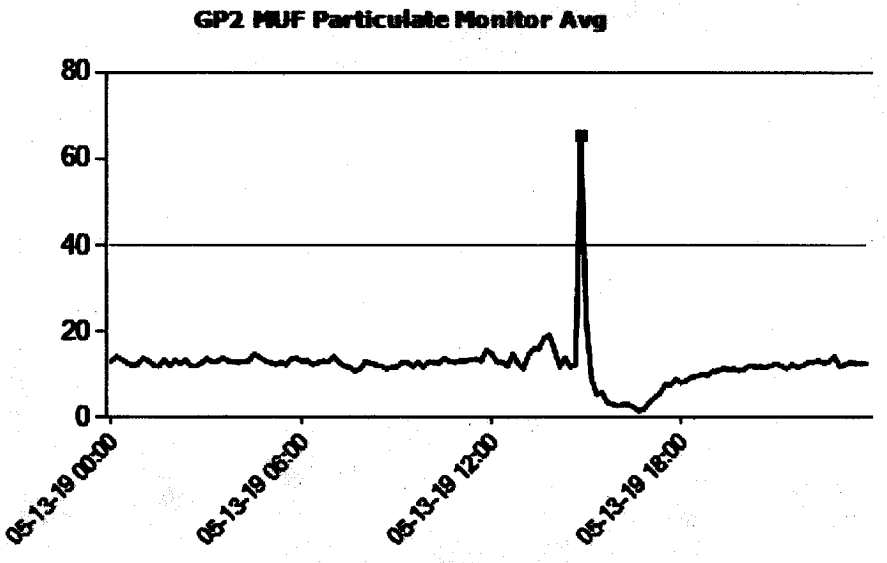


Unit: GP-2 Dryer Stack
Date: May 9th 2:20 AM-2:30 AM; 10:50 AM- 2:30 PM
Description: Moisture on particulate monitor from rain; maintenance out to clean monitor



Unit: GP-2 MUF
Date: May 13th 2:50 PM- 3:00 PM
Description: Unit transitioning from makeload to heatload

PAMPA PLANT

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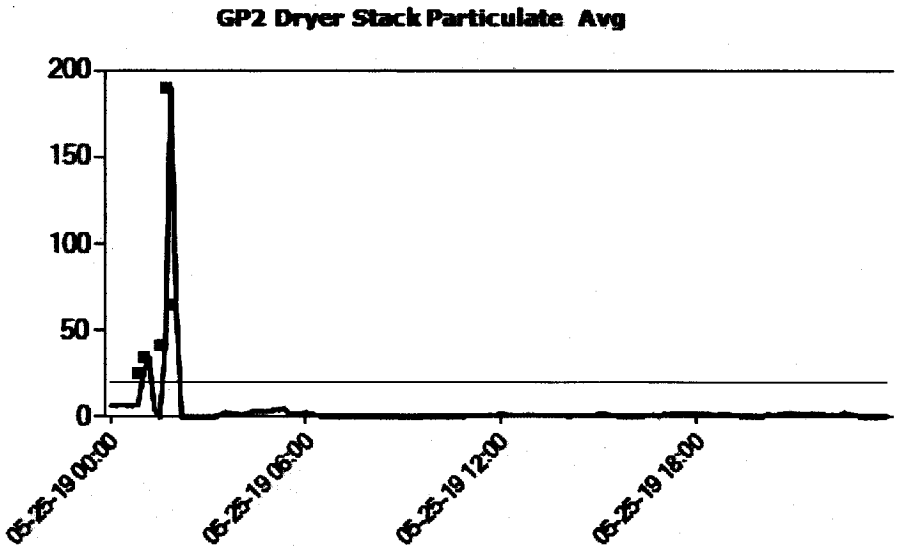
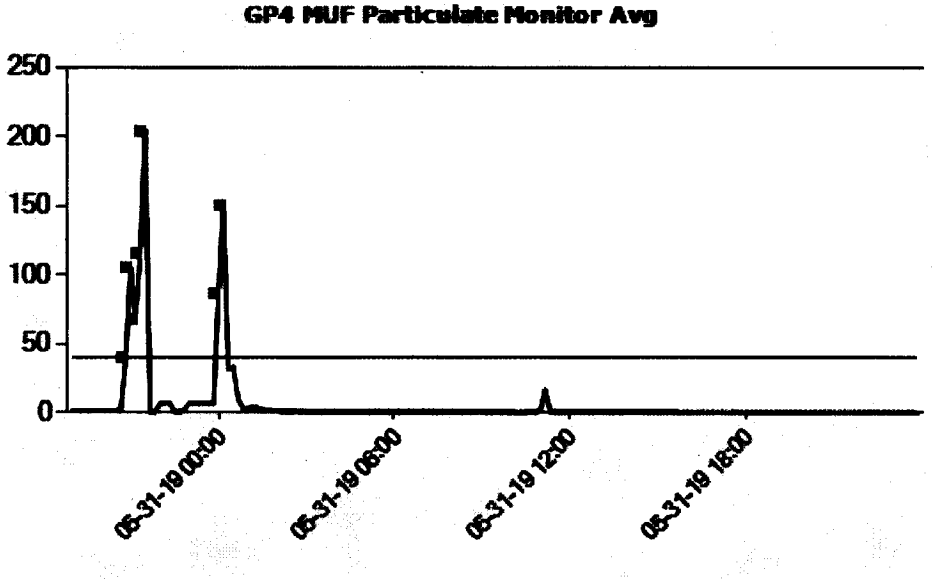


Unit: GP-2 Dryer Stack
Date: May 25th 1:00 AM- 2:20 AM
Description: Maintenance working on monitor



Unit: GP-4 MUF
Date: May 31st 12:10 AM- 12:20 AM
Description: Unit starting up, noticed a MUF Leak, took unit back to heatload

PAMPA PLANT

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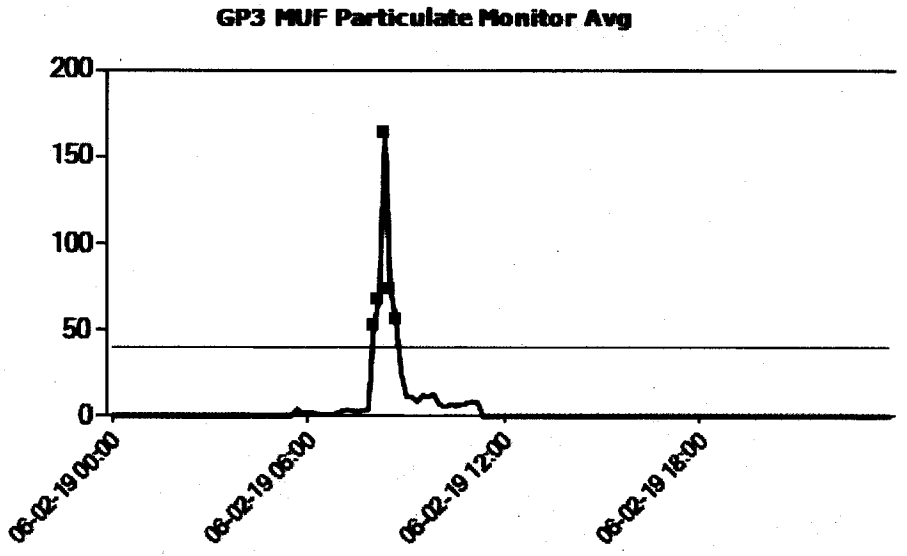

Unit: GP-3 MUF
Date: June 2nd 8:00 AM- 8:50 AM
Description: Unit on heatload

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PAMPA PLANT

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ATTACHMENT 3

EXPLANATION OF PERIODS OF PM EARLY WARNING SYSTEM DOWNTIME

PAMPA PLANT

REPORTING PERIOD: January 1, 2019– June 30, 2019

PMEWS Data Availability Detail: 01-Jan-2019 to 30-Jun-2019

CABOT

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
GP-0	Process Filter Dry Drum	28-Mar-2019 10:16	28-Mar-2019 10:17	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-0	Process Filter Dry Drum	20-Apr-2019 16:30	20-Apr-2019 16:31	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-0	Process Filter Fluffy-1	28-Mar-2019 10:16	28-Mar-2019 10:17	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	Dryer	28-Mar-2019 10:16	28-Mar-2019 10:17	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	Dryer	07-May-2019 20:31	07-May-2019 21:53	1.38	SelfTest	16384	Sensor in Maintenance Mode	Y
GP-2	Dryer	07-May-2019 22:54	07-May-2019 22:54	0.02	SelfTest	16384	Sensor in Maintenance Mode	Y
GP-2	Dryer	20-May-2019 10:22	20-May-2019 11:49	1.47	SelfTest	16	Span Fault (Contamination Probe)	Y
GP-2	Dryer	24-May-2019 23:52	25-May-2019 00:00	0.13	SelfTest	16	Span Fault (Contamination Probe)	Y
GP-2	Dryer	25-May-2019 00:00	25-May-2019 01:20	1.35	SelfTest	16384	Sensor in Maintenance Mode	Y
GP-2	Dryer	25-May-2019 04:09	25-May-2019 05:59	1.85	SelfTest	16	Span Fault (Contamination Probe)	Y
GP-2	Dryer	25-May-2019 06:00	25-May-2019 06:11	0.20	General	16	No Response From Sensor	Y
GP-2	Dryer	25-May-2019 06:12	25-May-2019 06:12	0.02	SelfTest	16	Span Fault (Contamination Probe)	Y
GP-2	MUF	28-Mar-2019 10:16	28-Mar-2019 10:17	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	MUF	20-Apr-2019 16:30	20-Apr-2019 16:31	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	Process Filter	28-Mar-2019 10:16	28-Mar-2019 10:17	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	Process Filter	20-Apr-2019 16:30	20-Apr-2019 16:31	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-3	MUF	28-Mar-2019 10:16	28-Mar-2019 10:17	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-3	MUF	20-Apr-2019 16:30	20-Apr-2019 16:31	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-4	MUF	28-Mar-2019 10:16	28-Mar-2019 10:17	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-5	MUF	20-Apr-2019 16:30	20-Apr-2019 16:31	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-5	Process Filter	20-Apr-2019 16:30	20-Apr-2019 16:31	0.01	Aspen	2	Comm Error - No Data in 15 min	Y

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VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

a. A description of the construction of the Control Technologies, CEMS, and PM Early Warning Systems required by this Consent Decree, including:

i. If construction is not underway, any available information concerning the construction schedule and the execution of major contracts.

Consistent with the provisions of the Second Amendment of the Consent Decree, physical, on-site construction of Control Technologies and CEMS did not commence at the Ville Platte facility during the relevant reporting period.

- Anticipated construction schedule:

  - Front End Engineering & Design – 6/2020 through 3/2021
  - Equipment fabrication – 6/2020 through 7/2021
  - Detailed Engineering – 5/2021 through 1/2022
  - Construction – 12/2020 through 7/2022
  - Start - up / Commissioning – 8/2022 thru 12/2022
  - Compliance – 12/31/2022

ii. If construction is underway, the estimated percent of installation as of the end of the reporting period, the current estimated construction completion date, and a brief description of completion of significant milestones during the reporting period.

Consistent with the provisions of the Second Amendment of the Consent Decree, physical, on-site construction activity did not commence during the relevant reporting period.

iii. Any information indicating that installation and commencement of operation may be delayed, including the nature and cause of the delay.

Based upon the best information currently available, Cabot has not identified any basis to anticipate any delay in satisfying the installation and construction schedules established under the Consent Decree.

iv. Once construction is complete, provide the dates the equipment was placed in service and/or commenced Continuous Operation and the dates of any testing that was performed during the period.

Consistent with the provisions of the Second Amendment of the Consent Decree, construction activity for the control equipment was not completed during the relevant reporting period.

In satisfaction of the relevant terms of the Consent Decree, Cabot installed the equipment associated with the PM Early Warning Systems (PMEWS), established the alarm set-points, and commenced continuous operation of the system as of the Effective Date of the Consent Decree.

b. All information necessary to demonstrate compliance with all applicable Emissions Limits, 30-day Rolling Average Sulfur Content Weight Percent, 365-day Rolling Average Sulfur Content Weight Percent, and other provisions in Sections VI (SO_2 Control Technology, Emissions Limits, and Monitoring Requirements), VII (NO_X Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements)

VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

- *Paragraph 17 - SO_2 Process System Operation, Emissions Limits and Control Technology*

  Pursuant to the terms of the Second Amendment of the Consent Decree, Cabot was not required during the relevant reporting period to demonstrate compliance with any applicable emissions limit, or other provision in Sections VI (SO_2 Control Technology, Emissions Limits, and Monitoring Requirements), VII (NO_X Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements) under the Consent Decree, except as specifically addressed herein.

- *Paragraph 18 - WGS Design Specifications*

  Pursuant to the terms of the Second Amendment of the Consent Decree, submittal of design specifications for the WGS is not required until 30 months prior to installation, specifically no later than June 30, 2020.

- *Paragraph 19 - SO_2 Alternative Equivalent Pollution Control Technology*

  Pursuant to the terms of the Second Amendment of the Consent Decree, if a SO_2 Alternative Equivalent Pollution Control Technology is elected, compliance with these requirements is not required until December 31, 2022, provided that a written request has been made by June 30, 2020, and written approval has been obtained from EPA.

- *Paragraph 20 - SO_2 Monitoring Requirements*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 23 - NO_X Emissions Limits Applicable to Heat Load Operation, Startup, and Shutdown*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 24 - Heat Load Operation, Startup, and Shutdown Compliance Calculation*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 25 - Alternative Heat Load Operation, Startup, and Compliance Calculation*

  Pursuant to the terms of the Consent Decree, Cabot has not requested an Alternative Heat Load Operation, Startup, and Compliance Calculation for NO_X.

- *Paragraph 26 - NO_X Process System Operation Emissions Limits and Control Technology*

  Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 27 - SCR Design Specifications*

VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

Pursuant to the terms of the Second Amendment of the Consent Decree, submittal of design specifications for the SCR is not required until 30 months prior to installation, specifically no later than June 30, 2020.

- *Paragraph 28 - NO_X Alternative Equivalent Pollution Control Technology*

Pursuant to the terms of the Second Amendment of the Consent Decree, if the NOx Alternative Equivalent Pollution Control Technology is elected, compliance with these requirements is not required until December 31, 2022. In addition, a request for approval must be submitted by June 30, 2020, and written approval must be granted by EPA.

- *Paragraph 29 - NO_X Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 30 - PM Control Technology and Emissions Limits*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until 180 days after December 31, 2022, or June 29, 2023.

- *Paragraph 31 - PM Stack Testing*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until 180 days after December 31, 2022, or June 29, 2023.

- *Paragraph 32 and Appendix B - Other PM Control Requirements*

During the reporting period, Cabot achieved and maintained compliance with the requirements of Paragraph 32 and Appendix B of the Consent Decree relative to particulate matter ("PM") control requirements. More specifically, for each PM emissions equipment unit:

  - Cabot employed the required PM Reduction Mechanism and Method for Managing PM Emissions specified in Appendix B of the Consent Decree.

  - Cabot completed the relevant daily visual assessments and maintained a record of the results of each such assessment.

  - Cabot developed and maintained a record of the results of each of the required daily visual assessments and associated Method 9 observations, when applicable.

- *Paragraph 33 and Appendix C - Particulate Emissions Best Management Practices Control Plan*

Cabot implemented the Particulate Emissions Best Management Practices Control Plan set forth in Appendix C of the Consent Decree, to the extent required during the reporting period.

- *Paragraph 34 and Appendix D - PM Early Warning System*

VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

Cabot maintained compliance with applicable requirements of the Consent Decree related to the PM Early Warning System throughout the reporting period. During the reporting period, Cabot operated each PM Early Warning System at all times of Heat Load Operation and Process System Operation, except during system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments of the applicable system, and for each PM Early Warning System.

During the reporting period, Cabot achieved a data availability of greater than 95% based on a quarterly average of the operating time of the emission unit or activity being monitored, and therefore, achieved full compliance with the minimum degree of availability requirements of the Consent Decree. In addition, in response to any alarm triggered during the reporting period for any PM Early Warning System at the facility, Cabot investigated the cause of the alarm as expeditiously as practicable and performed the required sequence of tasks to respond to the alarm.

On each Operating Day in this reporting period, Cabot conducted a visual review of the recorded data for each PM Early Warning System to identify trends in relative PM emissions.

Cabot also conducted routine maintenance during the reporting period in accordance with manufacturer's recommendations as addressed within the provisions in Paragraphs D.8a and D.8b of the Consent Decree.

d. All CEMS data collected for each Process System, from the time any Emissions Limit in Sections VI (SO_2 Control Technology, Emissions Limits, and Monitoring Requirements) and VII (NO_x Control Technology, Emissions Limits, and Monitoring Requirements) is exceeded until compliance is achieved, and an explanation of any periods of downtime of such CEMS.

- *Paragraph 20 - SO_2 Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 29 - NO_x Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

e. A copy of the protocol for any PM stack tests performed in accordance with the requirements of Paragraph 31

- *Paragraph 31 - PM Stack Testing*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until 180 days from December 31, 2022, or June 29, 2023.

f. All PM Early Warning System data collected, from the time a PM Early Warning System alarm is triggered until the PM Early Warning System data have returned to normal operating ranges, below levels triggering an alarm condition, and an explanation of any periods of PM Early Warning System downtime

Data collected for each event in which a PM Early Warning System alarm was triggered during this reporting period are presented in **Attachment 1**.

A summary of PM Early Warning System downtime, including required explanations for each period of downtime, is presented in **Attachment 2**.

g. A description of any violation of the requirements of this Consent Decree, including any violation resulting from Malfunctions, any exceedance of an Emissions Limit, any exceedance of a 30-day rolling Average Sulfur Content Weight Percent or 365-day Rolling Average Weight Percent, or any failure to install, commence operation or Continuously Operate and Control Technology or any PM Early Warning System, which includes:

i. the date and duration of, and the quantity of any emissions related to, the violation;

ii. a full explanation of the primary root cause and any other significant contributing cause(s) of the violation;

iii. a root cause analysis of all reasonable interim and long-term remedial steps or corrective actions, including all design, operation, and maintenance changes consistent with good engineering practices, if any, that could be taken to reduce or eliminate the probability of recurrence of such violation, and, if not already completed, a schedule for its (their) implementation, or, if Defendant concludes that remedial steps or corrective actions should not be conducted, the basis for that conclusion.

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

h. If no violations occurred during a reporting period, include a statement that no violations occurred.

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

i. A description of the status of any permit applications and any proposed SIP revisions required under this Consent Decree

Cabot was not required under the Consent Decree to submit any permit applications or any proposed SIP revision during this reporting period.

j. A summary of all actions undertaken, and Project Dollars expended during the reporting period, as well as any cumulative Project Dollars expended, and the estimated environmental benefits achieved to date in satisfaction of the requirements of Section V (Environmental Mitigation) and Appendix A.

A project completion notification was filed with the US EPA on November 2, 2015 by Cabot. With this submittal, all provisions of the Environmental Mitigation have been completed.

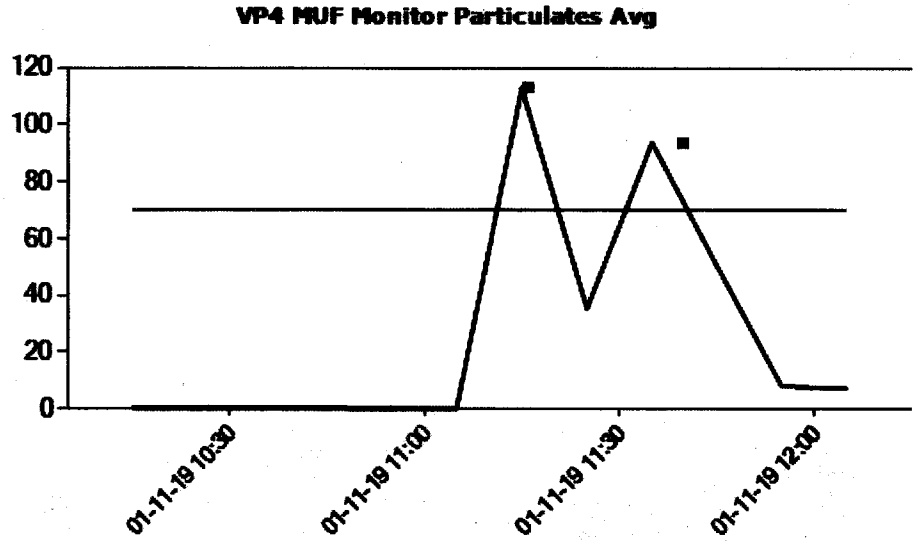
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

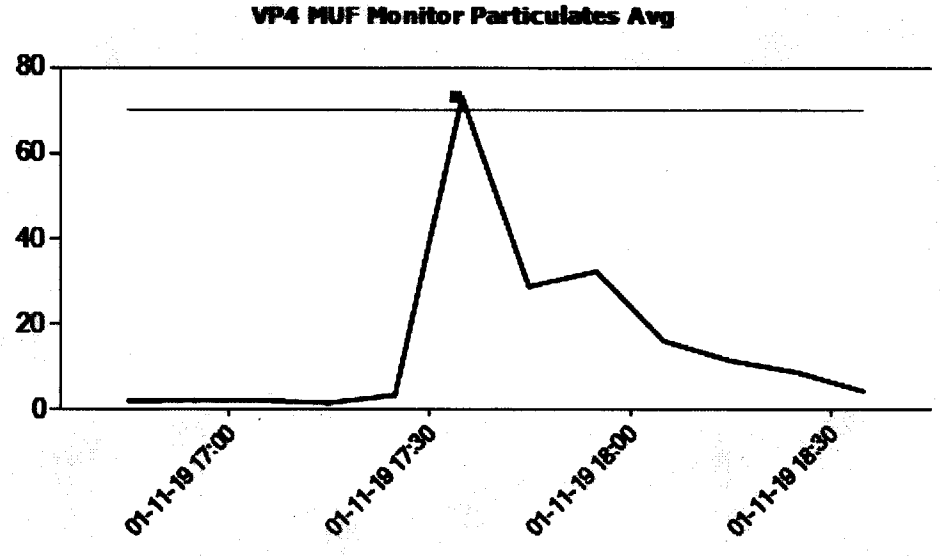
ATTACHMENT 1

PM EARLY WARNING SYSTEM DATA COLLECTED DURING HIGH PM EMISSIONS EVENTS

VP4 Main Unit Filter (MUF), 1/11/2019, 11:15 to 11:35. No visible emissions observed. Alarms received when bringing unit online.



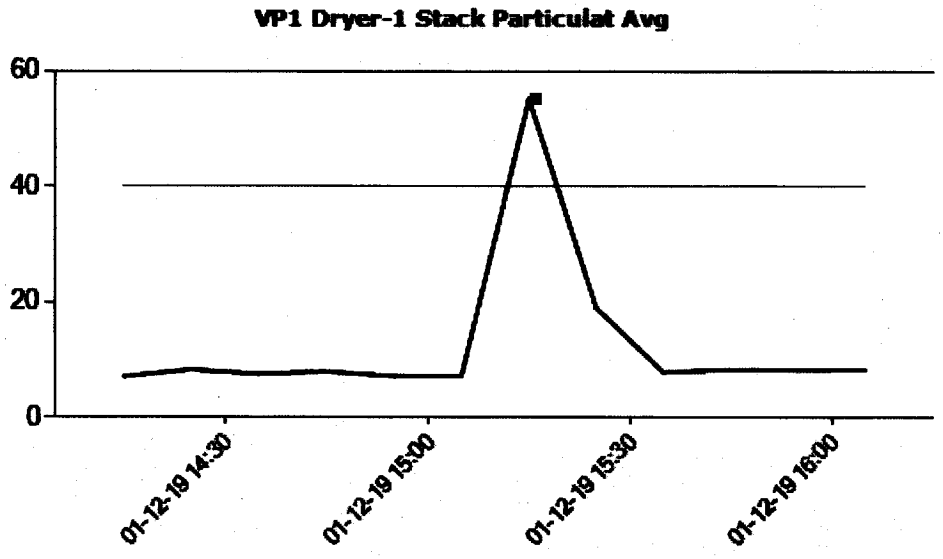
VP4 MUF 1/11/2019, 17:35. No leaks detected. Alarm received when going to makeload with the unit.



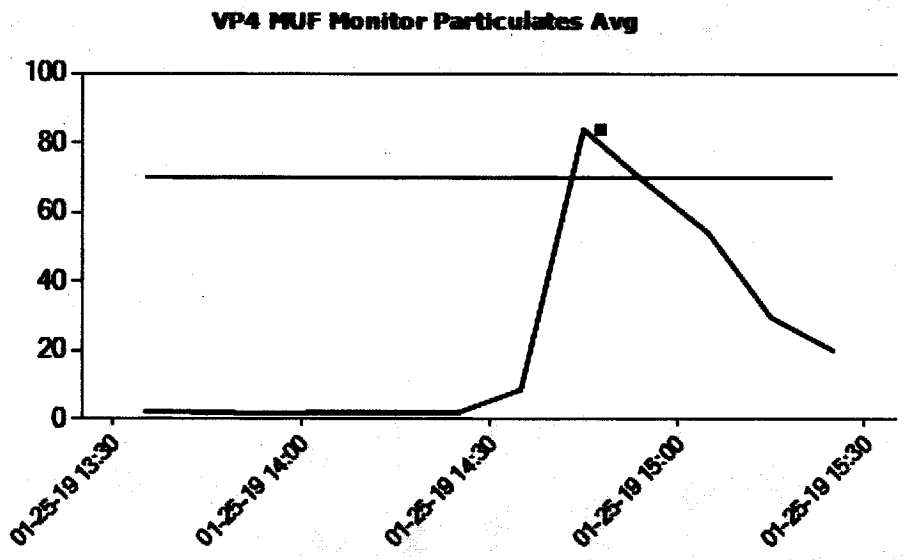
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP1 Dryer, 1/12/2019, 15:15. No visible emissions observed. Trend returned to normal.



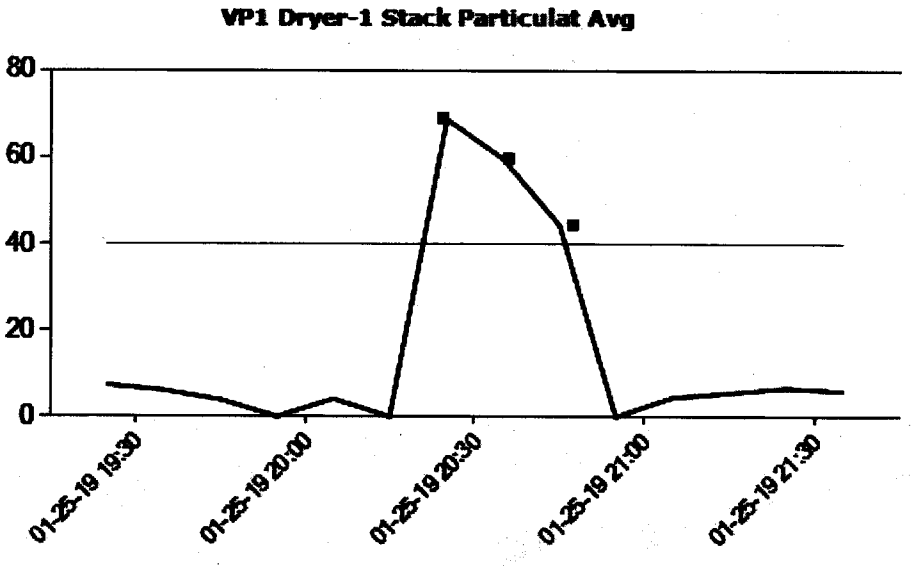
VP4 MUF 1/25/2019, 14:45. No visible emissions observed. Alarm received when starting unit.



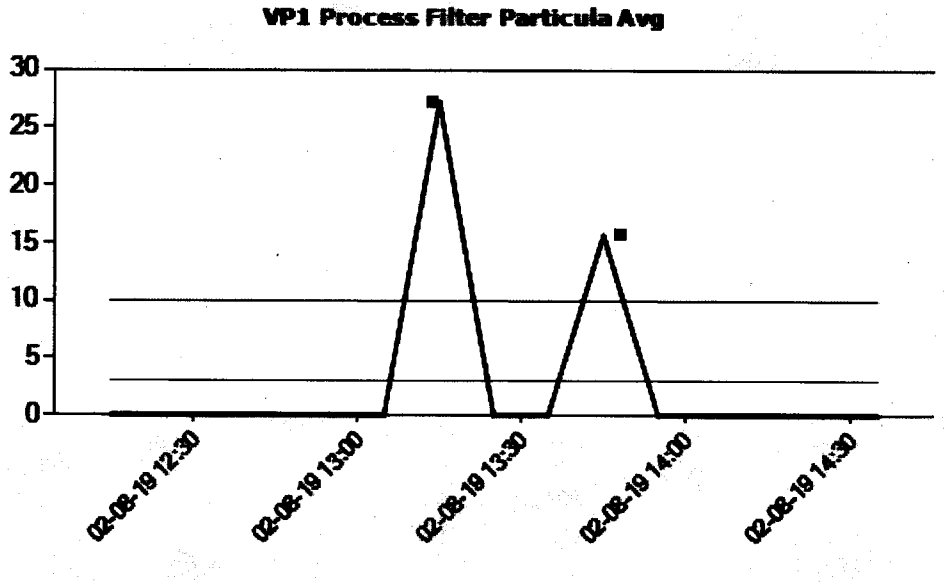
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP1 Dryer, 1/25/2019, 20:25 to 20:45. Alarms triggered when bringing dryer online. No visible emissions observed. Trend returned to normal.



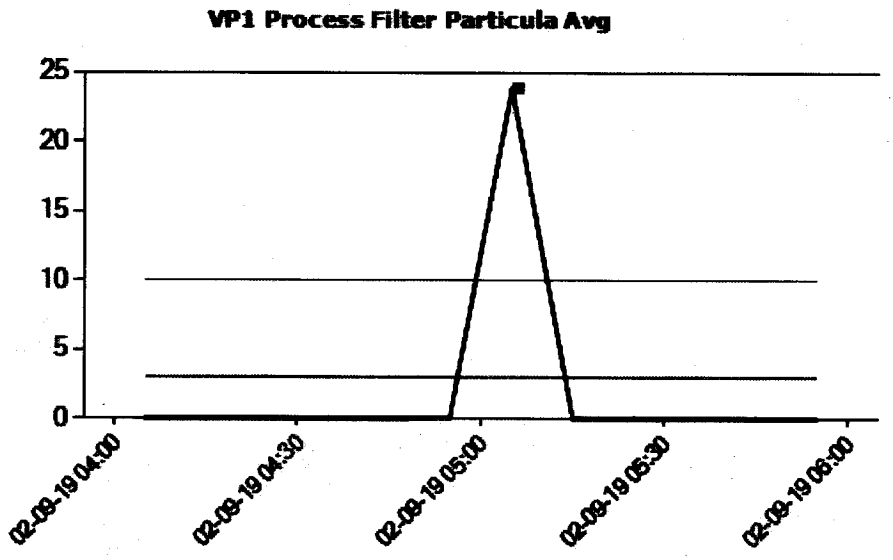
VP1 Process Filter, 2/8/2019, 13:15 to 13:45. No visible emissions observed.



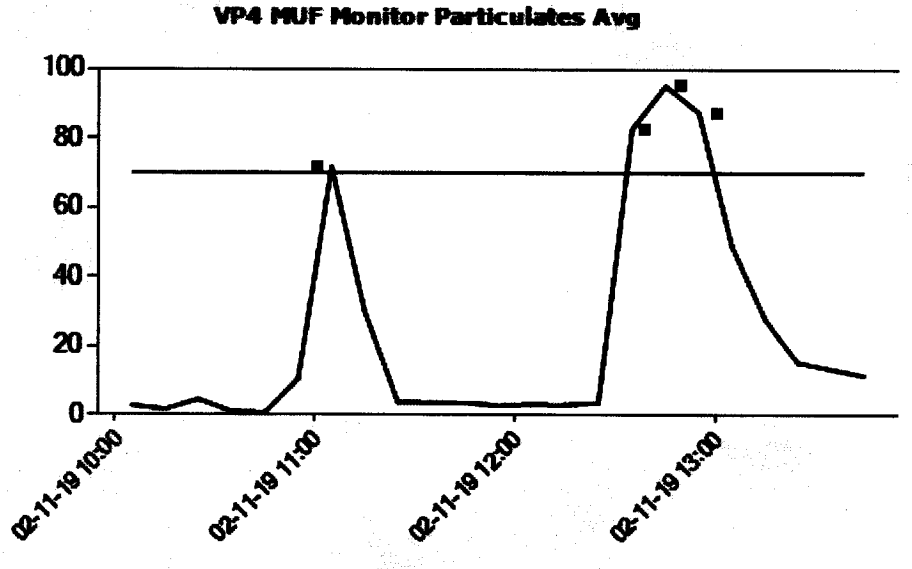
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP1 Process Filter, 2/9/2019, 05:05. Pipe cleaner sample taken and was clean. No visible emissions observed.



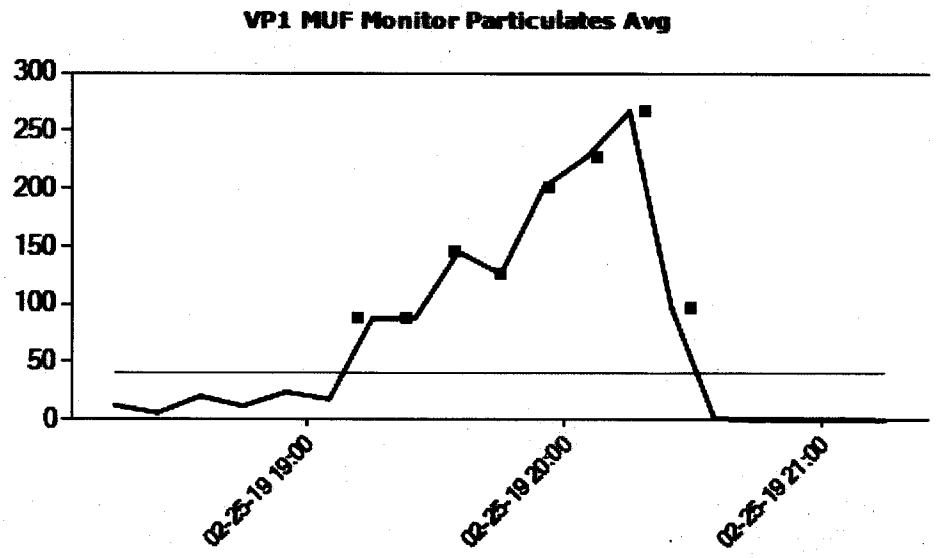
VP4 MUF, 2/11/2019, 11:05 to 12:55. No visible emissions observed.



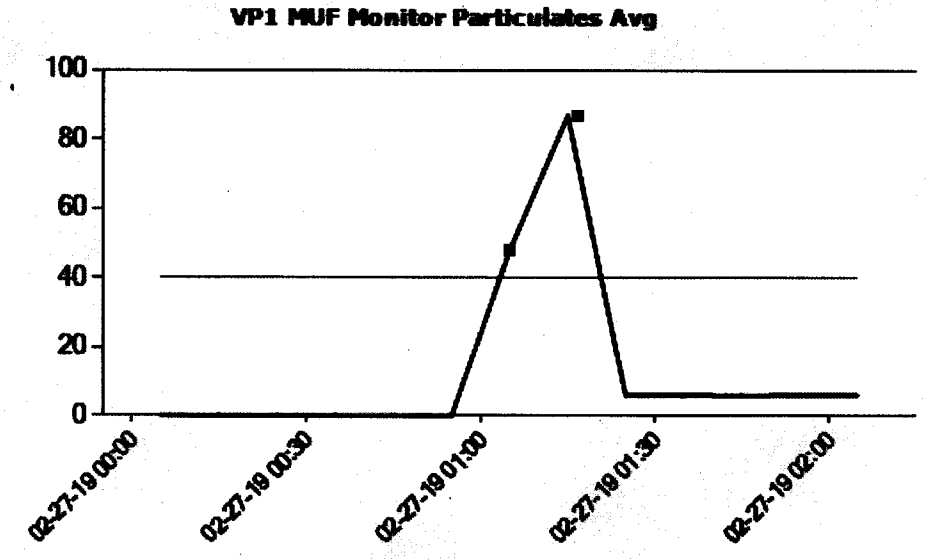
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP1 MUF, 2/25/2019, 19:15 to 20:25. Unit taken to heatload for repairs due to suspected bag leak.



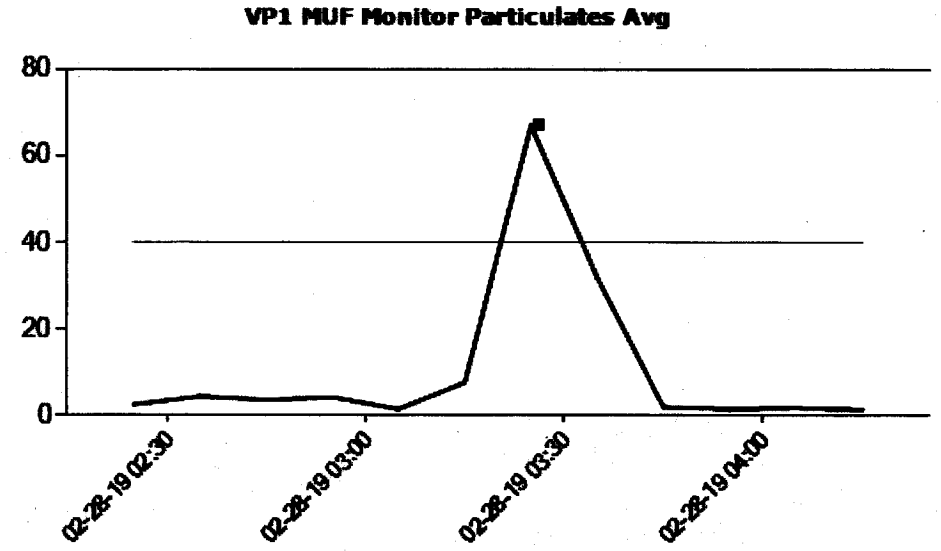
VP1 MUF, 2/27/2019, 01:05 to 01:15. Alarms received when taking unit to heatload.



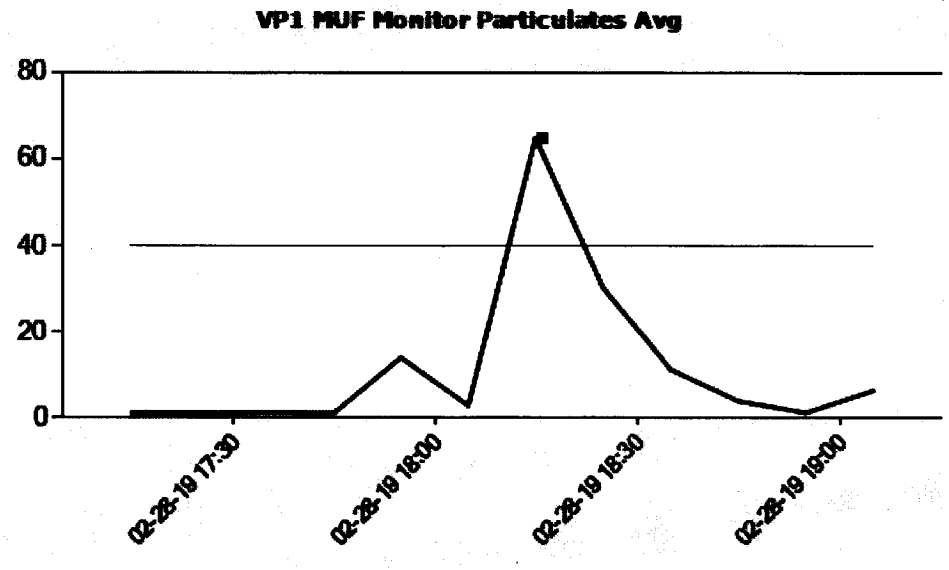
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP1 MUF, 2/28/2019, 03:25. Alarm received following production equipment adjustment. Trend immediately returned to normal.



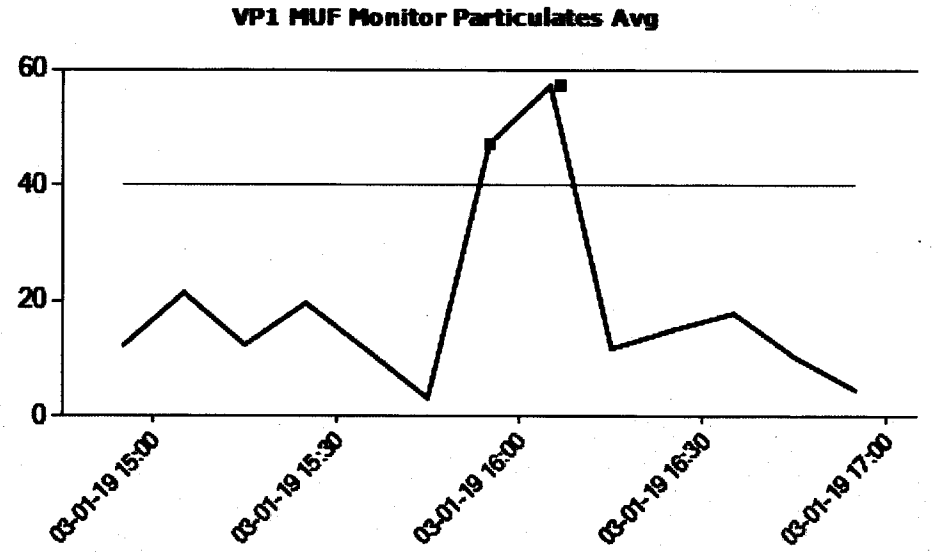
VP1 MUF, 2/28/2019, 18:15. Alarm received immediately following heavy rainfall event. No visible emissions observed.



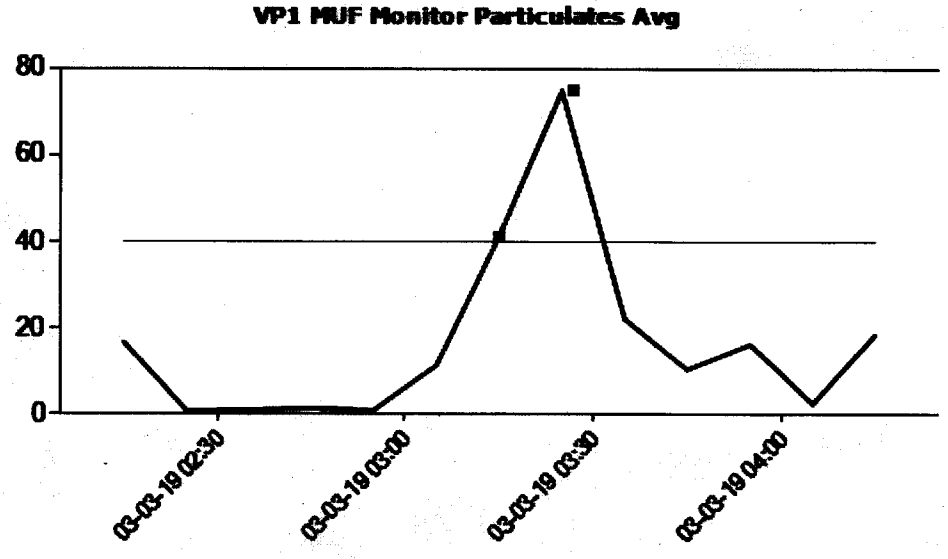
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP1 MUF, 3/1/2019, 15:55 to 16:05. No visible emissions observed.



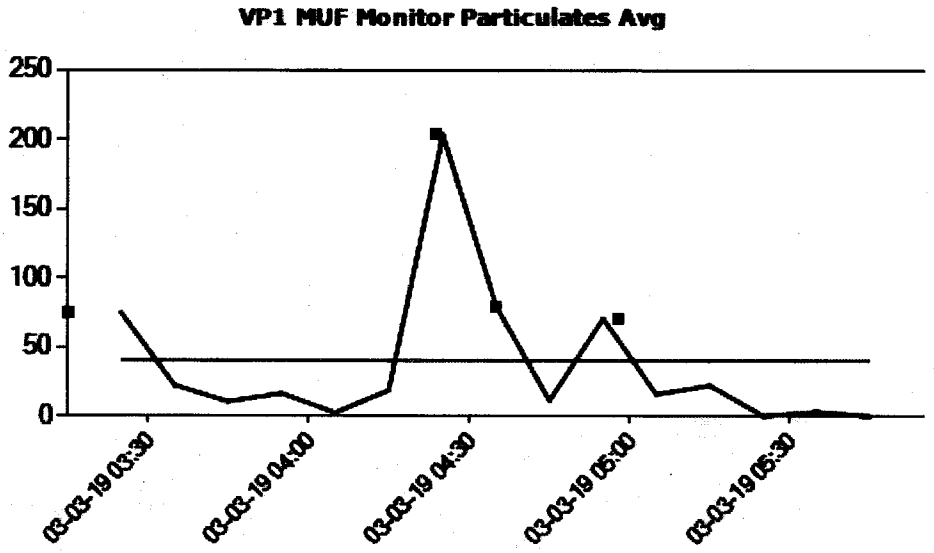
VP1 MUF, 3/3/2019, 03:15 to 03:25. Flare observed. Observation suggested that emissions were not above normal. Possible issues with particulate monitor.



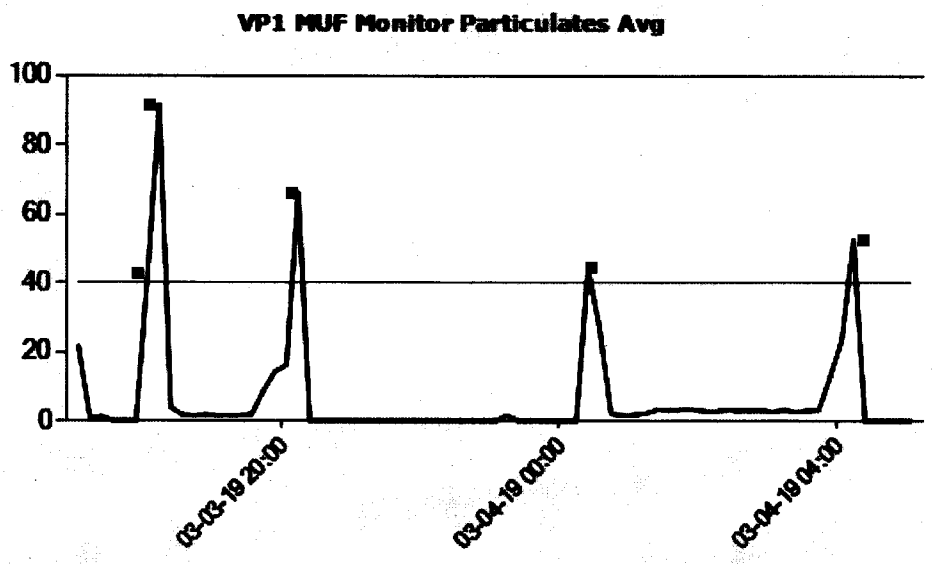
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP1 MUF, 3/3/2019, 04:25 to 04:55. Flare observed. Observation suggested that emissions were not above normal. Purge air adjusted on particulate monitor.



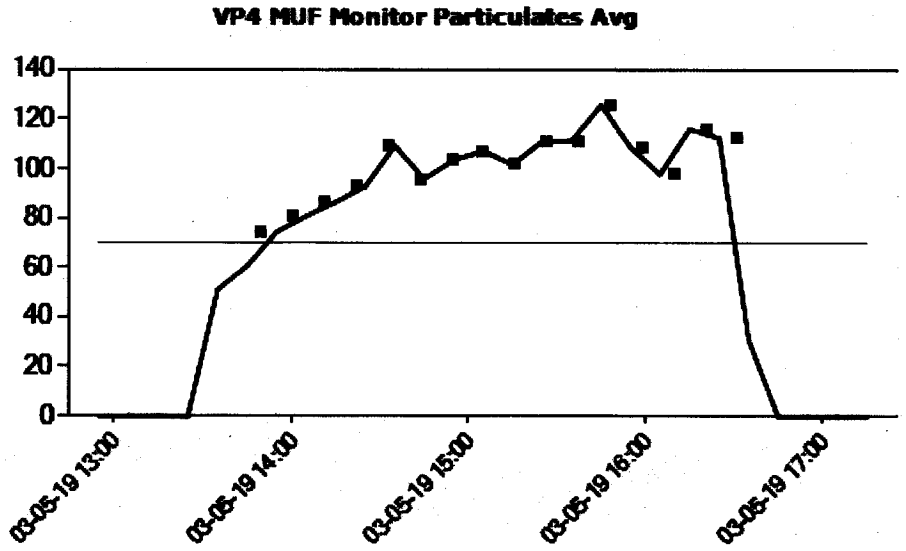
VP1 MUF, 3/3/2019, 18:05 to 3/4/2019, 04:15. Alarms received after grade changing the unit. Flare observed. Observation suggested that emissions were not above normal. Maintenance request entered to diagnose issues with particulate monitor.



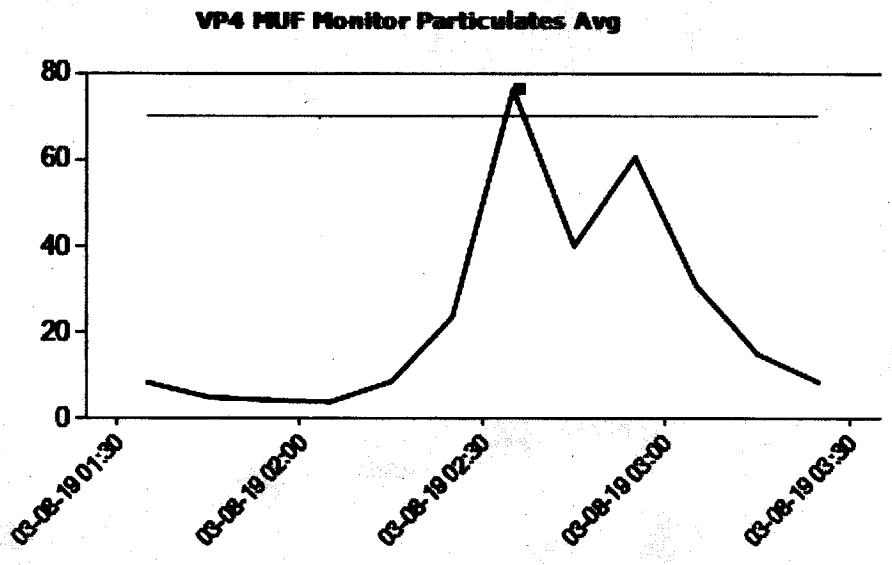
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 3/5/2019, 13:55 to 16:25. Attributed to issues with particulate monitor. Maintenance request entered to diagnose issues with particulate monitor.



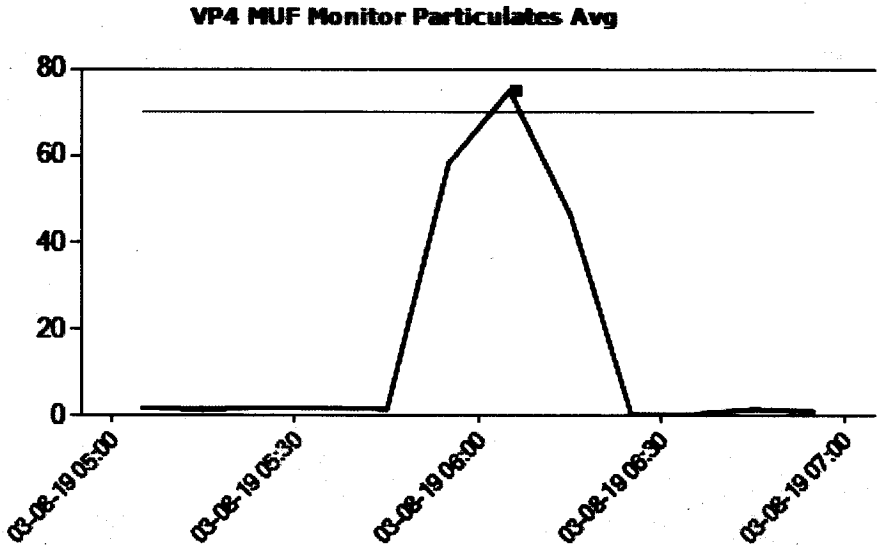
VP4 MUF, 3/8/2019, 02:35. Alarm received while unit was on heatload.



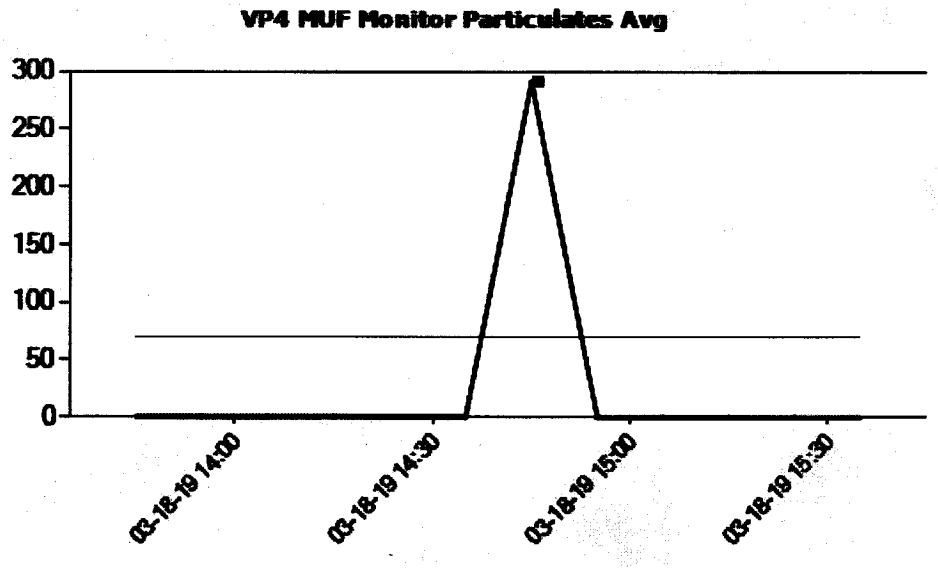
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 3/8/2019, 06:05. Alarm received while bringing unit onto makeload. Unit tripped soon after.



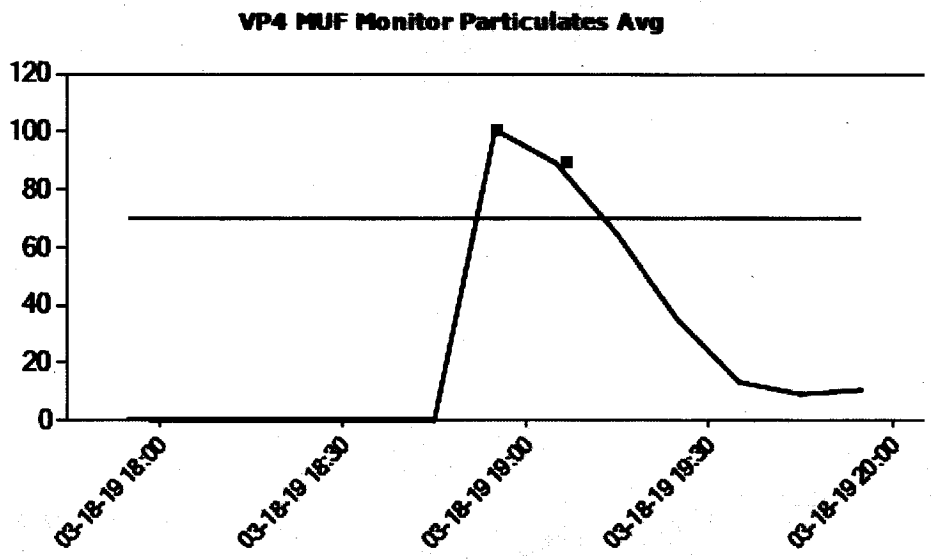
VP4 MUF, 3/18/2019, 14:45. Alarm received while bringing unit onto makeload. No visible emissions observed.



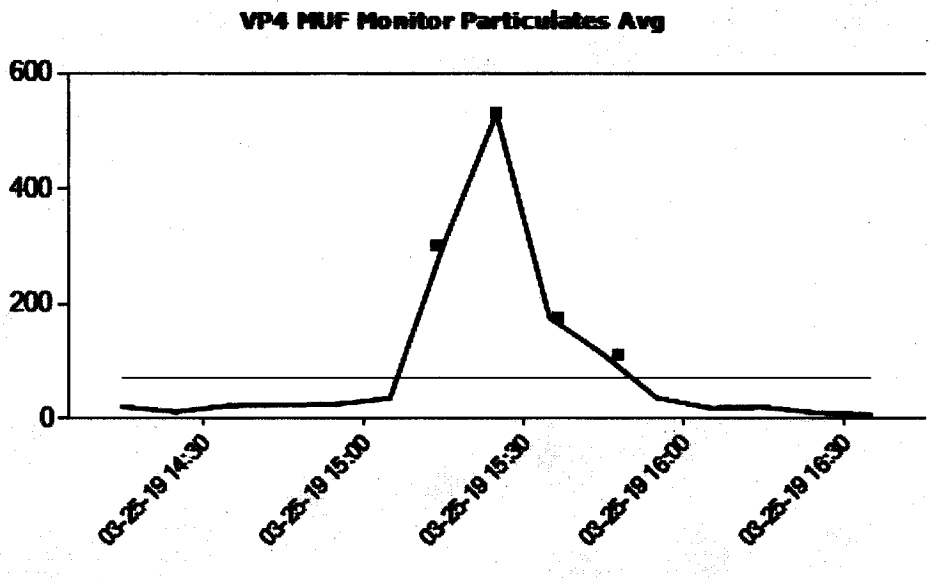
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 3/18/2019, 18:55 to 19:05. Alarm received while bringing unit onto makeload. No visible emissions observed.



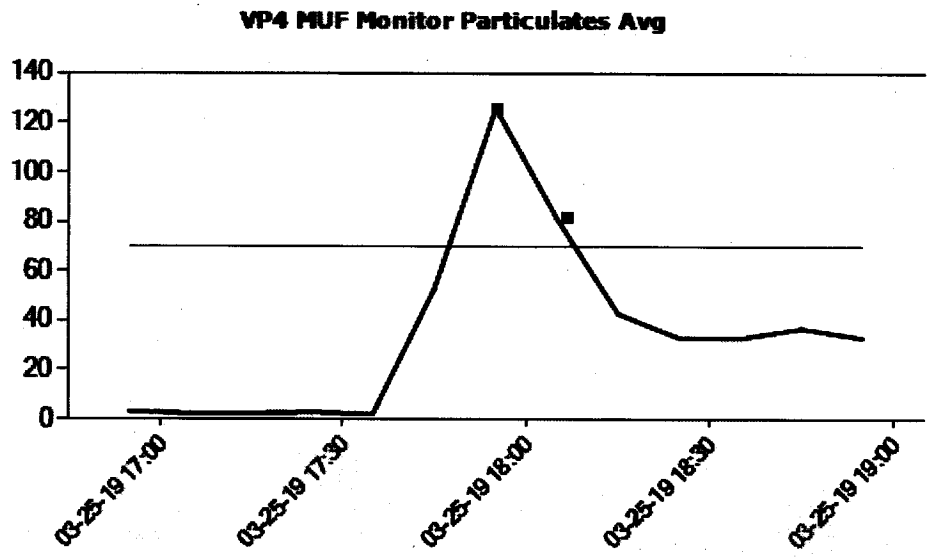
VP4 MUF, 3/25/2019, 15:15 to 15:45. Alarms received while unit was on heatload. No visible emissions observed.



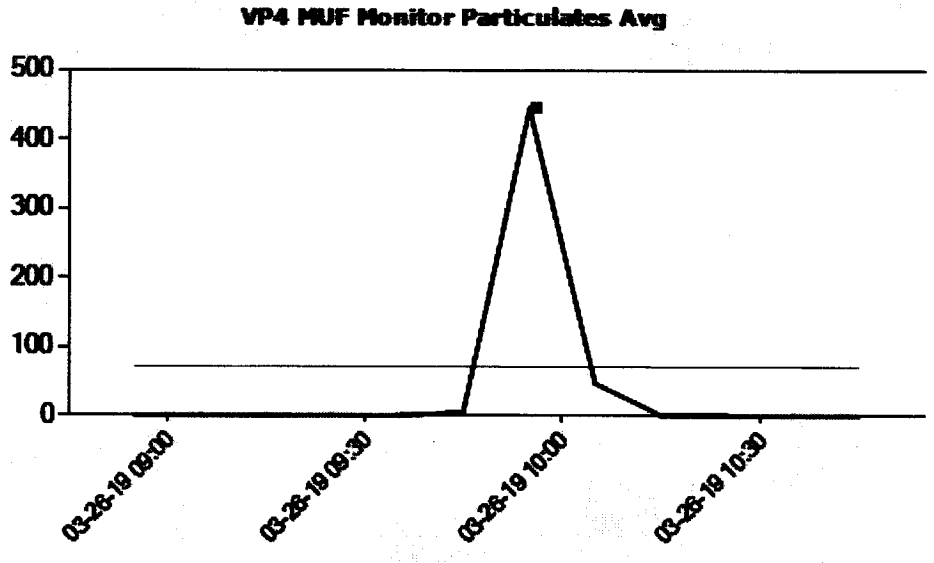
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 3/25/2019, 17:55 to 18:05. Alarms received when placing unit on makeload. No visible emissions observed.



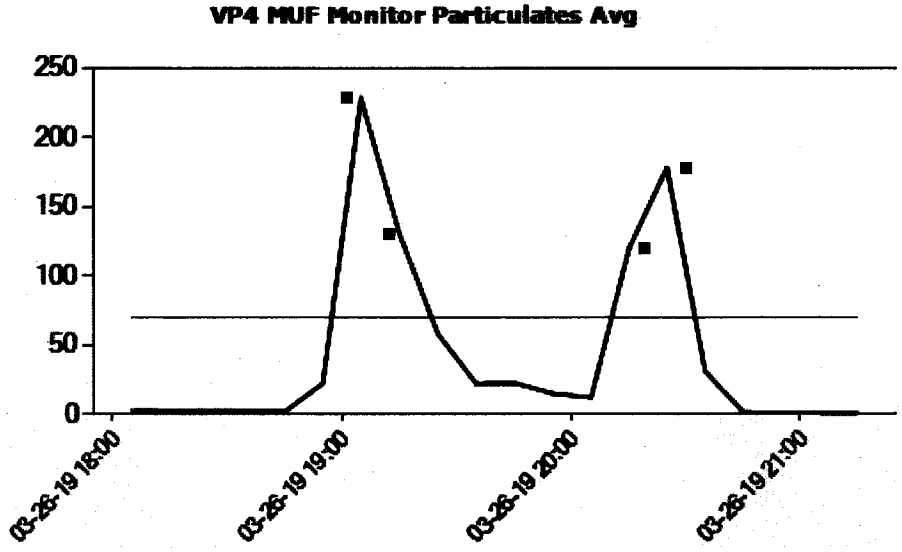
VP4 MUF, 3/26/2019, 09:55. Alarm received while testing repressuring fan. Unit was not on production. No visible emissions observed.



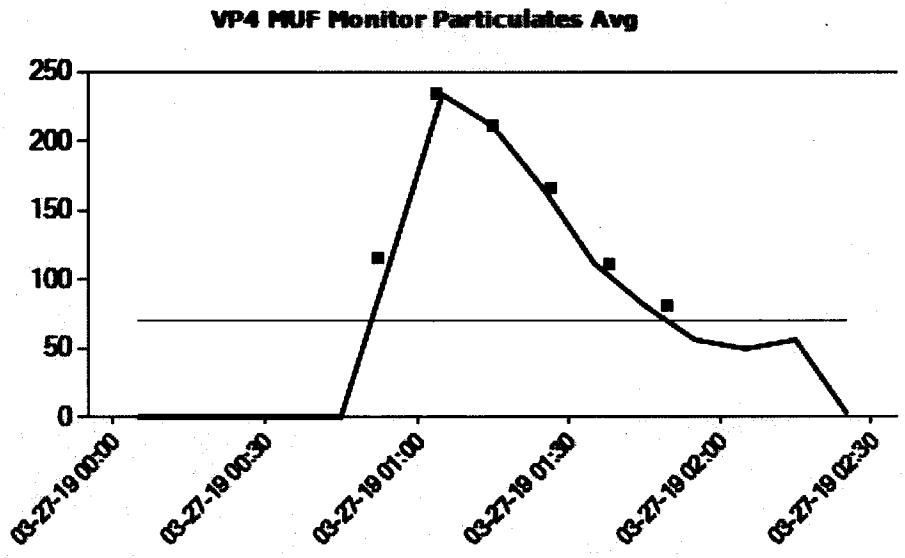
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 3/26/2019, 19:05 to 20:25. Alarms received while bringing the unit onto and off of makeload. No visible emissions observed. Trend returned to normal.



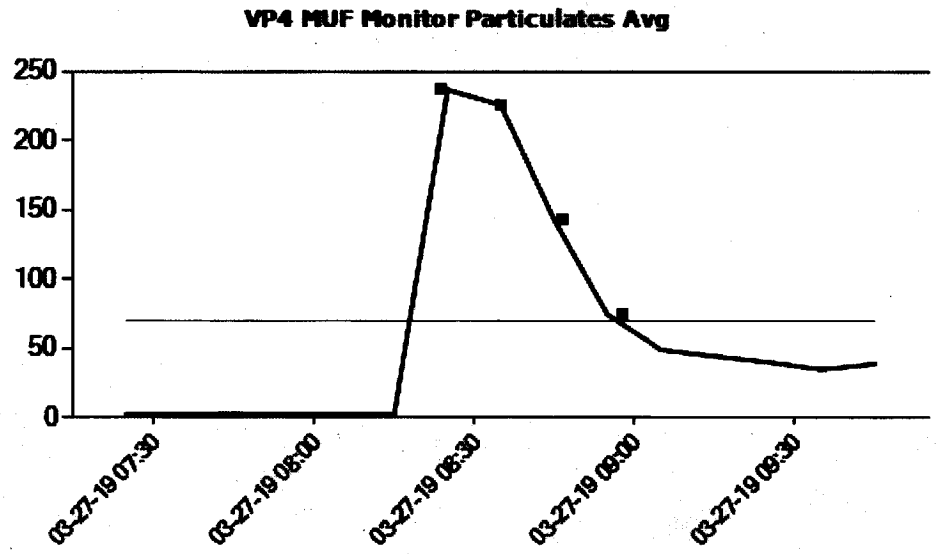
VP4 MUF, 3/27/2019, 00:55 to 01:45. Alarms received while starting unit. Flare was observed. Trend returned to normal.



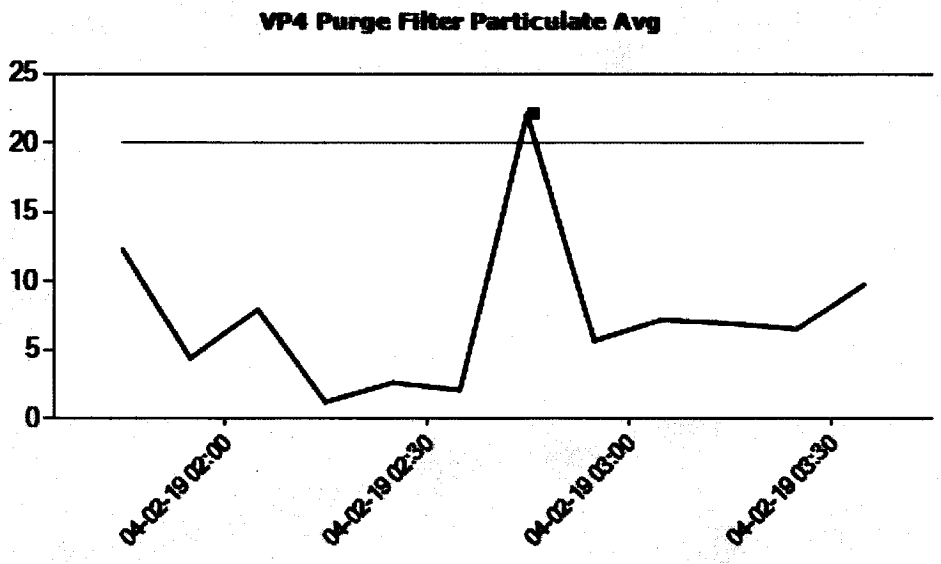
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 3/27/2019, 08:25 to 08:55. Alarms received while starting unit. No visible emissions observed.



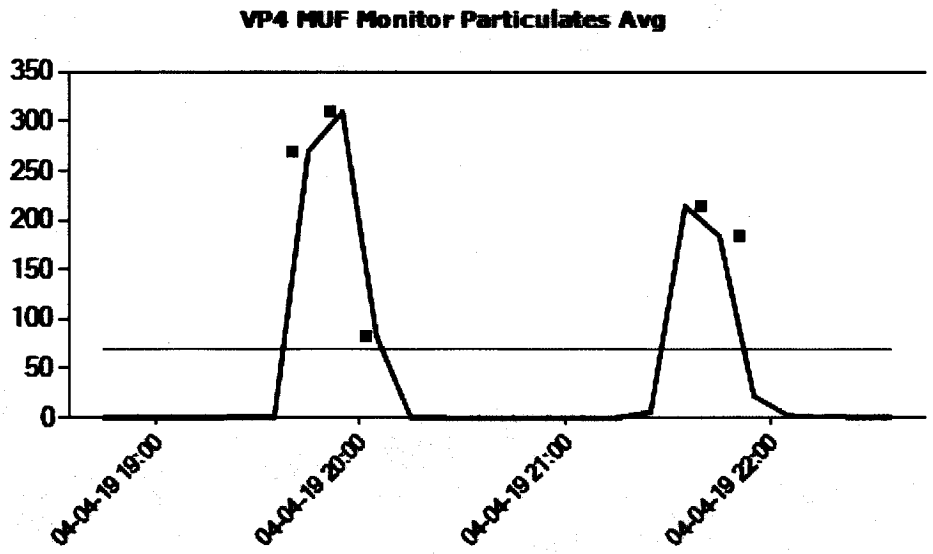
VP4 Purge Filter, 4/2/2019, 02:45. Two pipe cleaner samples taken, both were clean. Isolated row in filter in response to alarms.



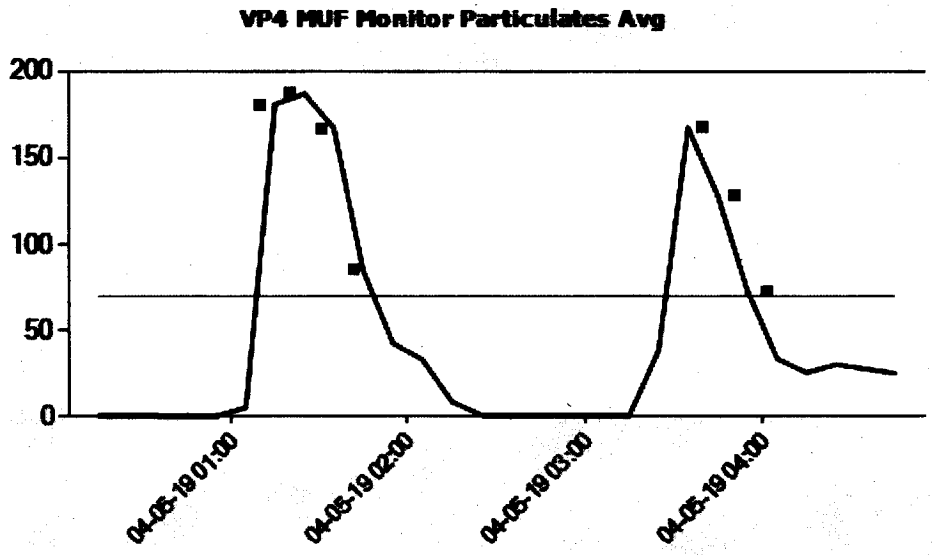
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 4/4/2019, 19:45 to 21:45. Alarms received when cycling unit unto and off of makeload due to plugged injectors.



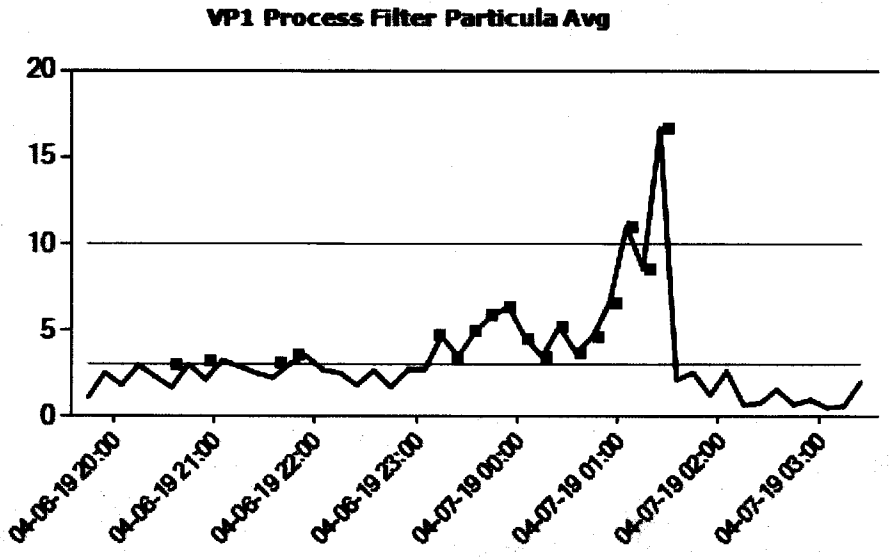
VP4 MUF, 4/5/2019, 01:15 to 03:55. Alarms received when cycling unit unto and off of makeload due to plugged injectors.



VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

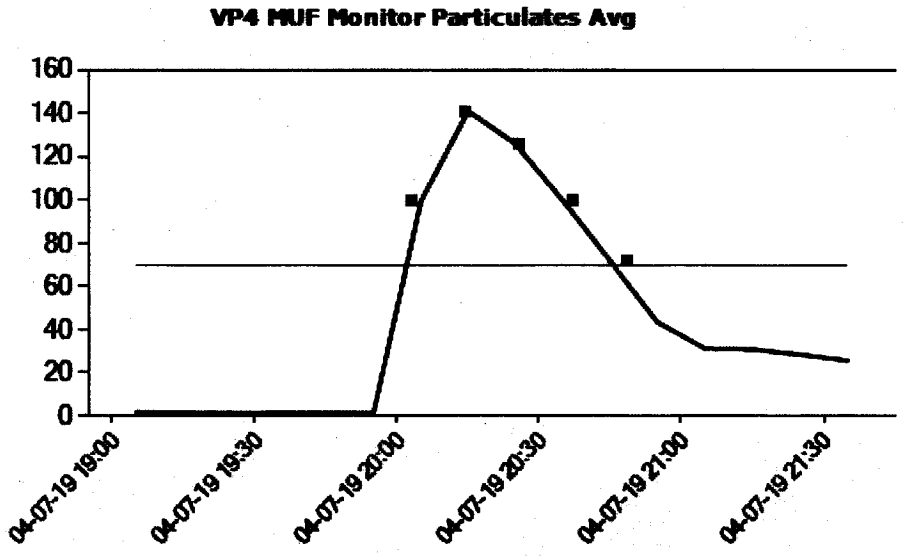
VP1 Process Filter, 4/6/2019, 20:45 to 4/7/2019, 01:25. Filter rows isolated in response to alarms. Pipe cleaner sample taken, clean following isolation of rows.



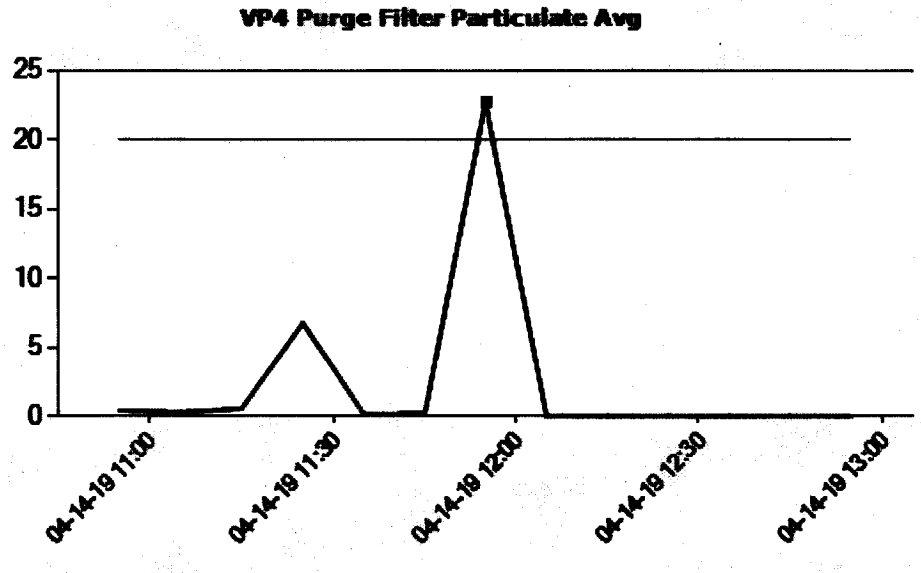
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 4/7/2019, 20:05 to 20:45. Alarms received when starting unit. Heavy rainfall occurring during alarms. Trend returned to normal, flare appeared normal.



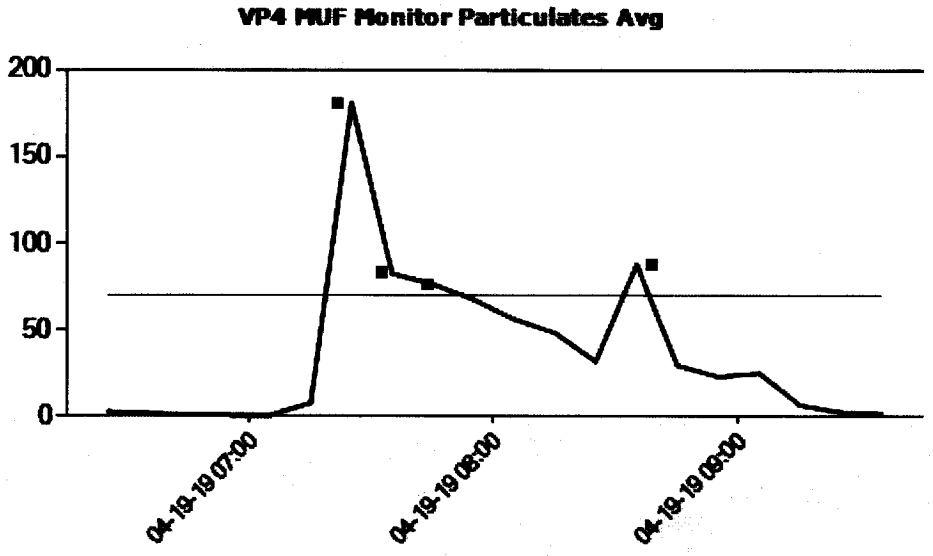
VP4 Purge Filter, 4/14/2019, 11:55. No visible emissions observed.



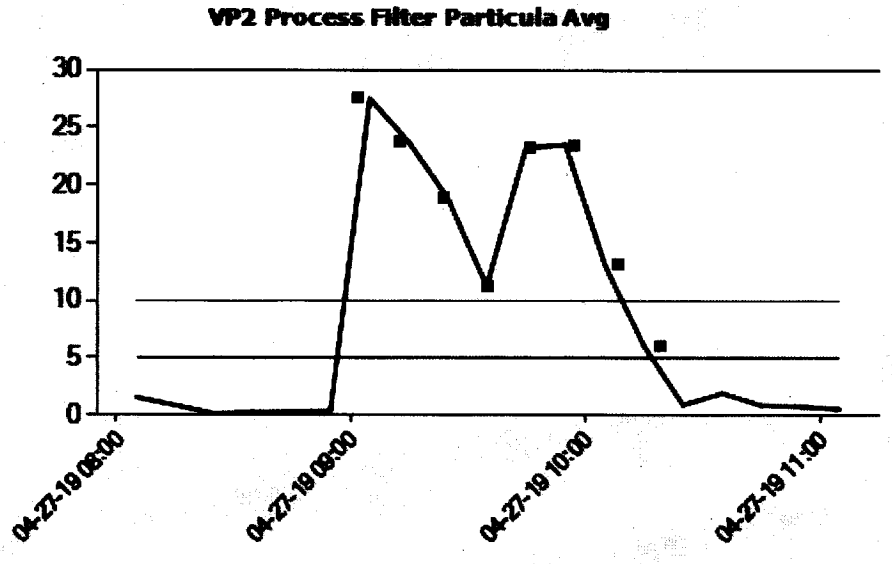
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 MUF, 4/19/2019, 07:25 to 08:35. Alarms received during MUF start-up and tail gas purge. No visible emissions observed.



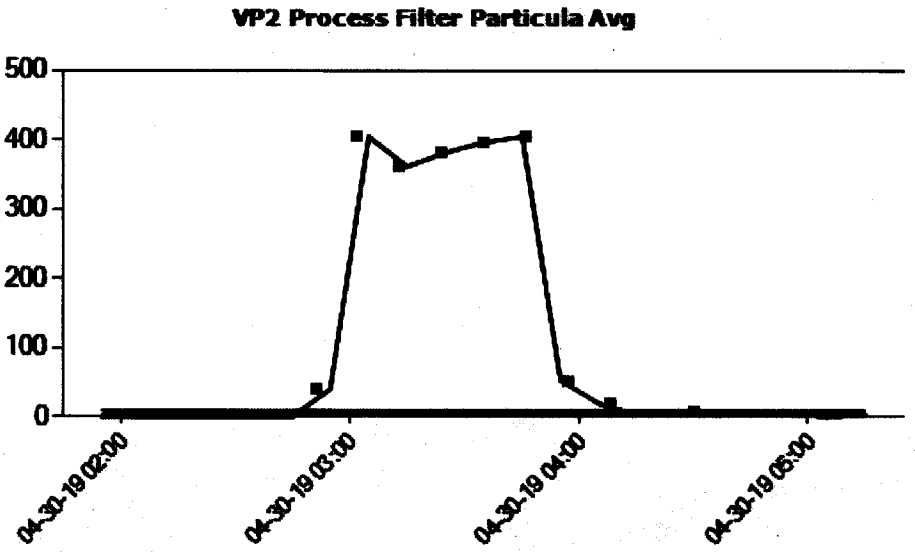
VP2 Process Filter, 4/27/2019, 09:05 to 10:05. Alarms received due to process filter upset following a grade change. No visible emissions observed.



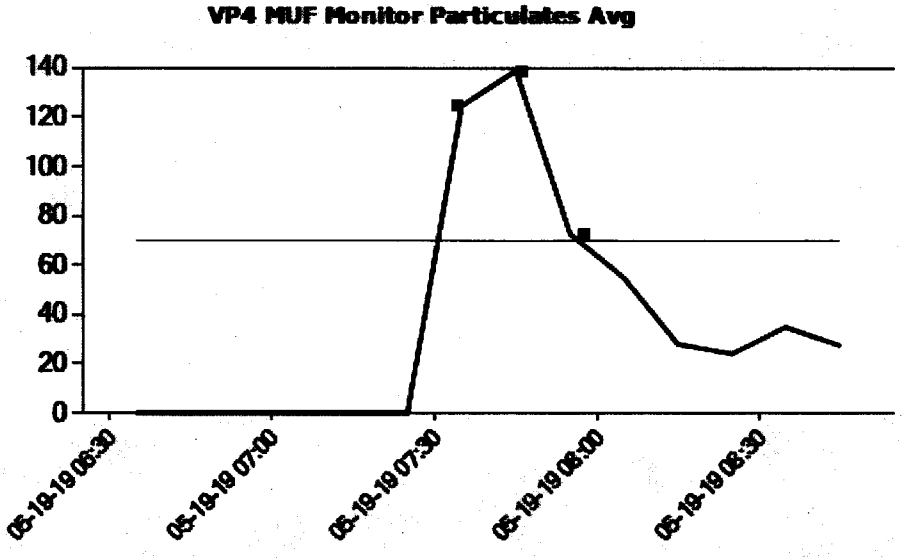
VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP2 Process Filter, 4/30/2019, 02:55 to 04:05. Alarms received due to fallen bag in filter. Immediately responded to alarms by plugging bag hole.



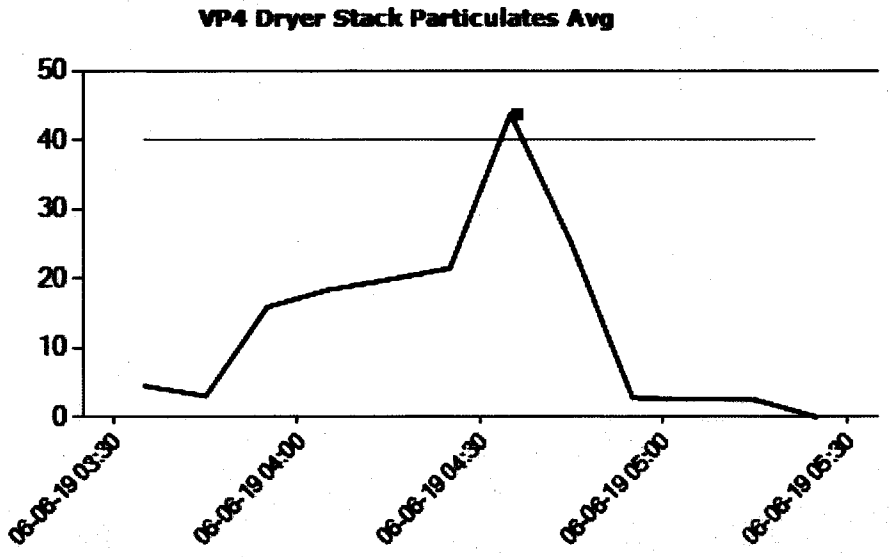
VP4 MUF, 5/19/2019, 07:35 to 07:55. Alarms received while unit was on heatload. No visible emissions observed.



VILLE PLATTE PLANT

REPORTING PERIOD: JANUARY 1, 2019 – JUNE 30, 2019

VP4 Dryer, 6/6/2019, 04:35. Alarm occurred during heavy rains. Unit was on heatload at time of alarm.



VILLE PLATTE PLANT

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ATTACHMENT 2

EXPLANATION OF PERIODS OF PM EARLY WARNING SYSTEM DOWNTIME

PMEWS Data Availability Detail: 01-Jan-2019 to 30-Jun-2019

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-1	Dryer	16-Feb-2019 03:14	16-Feb-2019 03:26	0.20	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-1	Dryer	23-May-2019 02:16	23-May-2019 02:27	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-1	MUF	02-Mar-2019 11:05	02-Mar-2019 13:52	2.78	SelfTest	128	Clean Probe (Short CircuitFault)	Y
VP-1	MUF	03-Mar-2019 05:45	03-Mar-2019 05:53	0.13	SelfTest	128	Clean Probe (Short CircuitFault)	Y
VP-1	MUF	04-Mar-2019 00:05	04-Mar-2019 01:37	1.53	SelfTest	128	Clean Probe (Short CircuitFault)	Y
VP-1	MUF	04-Mar-2019 07:42	04-Mar-2019 08:14	0.53	SelfTest	128	Clean Probe (Short CircuitFault)	Y
VP-1	MUF	11-Mar-2019 16:59	12-Mar-2019 00:00	7.01	SelfTest	128	Clean Probe (Short CircuitFault)	Y
VP-1	MUF	12-Mar-2019 00:00	13-Mar-2019 00:00	24.00	SelfTest	128	Clean Probe (Short CircuitFault)	Y
VP-1	MUF	13-Mar-2019 00:00	13-Mar-2019 08:13	8.22	SelfTest	16384	Sensor in Maintenance Mode	Y
VP-1	MUF	13-Mar-2019 08:16	13-Mar-2019 08:37	0.35	SelfTest	16384	Sensor in Maintenance Mode	Y
VP-1	MUF	13-Mar-2019 09:59	13-Mar-2019 10:03	0.07	SelfTest	16384	Sensor in Maintenance Mode	Y
VP-1	MUF	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-1	MUF	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-1	MUF	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-1	Process Filter	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-1	Process Filter	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-1	Process Filter	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-1	Purge Filter	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y

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Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-1	Purge Filter	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-1	Purge Filter	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-1	16-Feb-2019 03:14	16-Feb-2019 03:26	0.20	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-2	16-Feb-2019 03:14	16-Feb-2019 03:26	0.20	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-2	23-May-2019 02:16	23-May-2019 02:27	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-3	16-Feb-2019 03:14	16-Feb-2019 03:26	0.20	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-4	16-Feb-2019 03:14	16-Feb-2019 03:26	0.20	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-4	23-May-2019 02:16	23-May-2019 02:27	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-5	03-Jan-2019 01:46	03-Jan-2019 05:12	3.43	SelfTest	16384	Sensor in Maintenance Mode	Y
VP-2	Dryer-5	16-Feb-2019 03:14	16-Feb-2019 03:26	0.20	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-5	23-May-2019 02:16	23-May-2019 02:27	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	MUF	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	MUF	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-2	MUF	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	MUF	13-Jun-2019 08:44	13-Jun-2019 11:26	2.70	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
VP-2	MUF	13-Jun-2019 17:01	13-Jun-2019 17:03	0.02	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
VP-2	MUF	13-Jun-2019 17:05	13-Jun-2019 17:08	0.05	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
VP-2	MUF	13-Jun-2019 17:09	13-Jun-2019 17:18	0.15	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
VP-2	Process Filter	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Process Filter	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-2	Process Filter	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y

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Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-2	Purge Filter	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Purge Filter	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-2	Purge Filter	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	Dryer	16-Feb-2019 03:14	16-Feb-2019 03:26	0.20	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	Dryer	23-May-2019 02:16	23-May-2019 02:27	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	MUF	12-Jan-2019 21:53	13-Jan-2019 00:00	2.11	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
VP-3	MUF	13-Jan-2019 00:00	13-Jan-2019 04:17	4.29	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
VP-3	MUF	13-Jan-2019 16:58	14-Jan-2019 00:00	7.03	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
VP-3	MUF	14-Jan-2019 00:00	14-Jan-2019 07:39	7.65	SelfTest	16384	Sensor in Maintenance Mode	Y
VP-3	MUF	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	MUF	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-3	MUF	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	Process Filter	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	Process Filter	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-3	Process Filter	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	Purge Filter	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	Purge Filter	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-3	Purge Filter	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	Dryer	04-Jan-2019 04:46	04-Jan-2019 05:17	0.52	SelfTest	1	Zero Fault (Main Probe)	Y
VP-4	Dryer	04-Jan-2019 05:19	04-Jan-2019 06:16	0.95	SelfTest	1	Zero Fault (Main Probe)	Y
VP-4	Dryer	04-Jan-2019 07:35	04-Jan-2019 08:28	0.88	SelfTest	16384	Sensor in Maintenance Mode	Y

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Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-4	Dryer	16-Feb-2019 03:14	16-Feb-2019 03:26	0.20	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	Dryer	23-May-2019 02:16	23-May-2019 02:27	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	MUF	04-Jan-2019 08:17	04-Jan-2019 08:35	0.30	SelfTest	2	Zero Fault (Contamination Probe)	Y
VP-4	MUF	05-Mar-2019 08:31	06-Mar-2019 00:00	15.48	SelfTest	16512	Error Code->16512	Y
VP-4	MUF	06-Mar-2019 00:00	06-Mar-2019 09:26	9.44	SelfTest	16384	Sensor in Maintenance Mode	Y
VP-4	MUF	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	MUF	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-4	MUF	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	Process Filter	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	Process Filter	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-4	Process Filter	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	Purge Filter	04-Jun-2019 20:02	04-Jun-2019 20:05	0.04	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	Purge Filter	04-Jun-2019 20:05	04-Jun-2019 20:10	0.08	Aspen	2	Comm Error - No Data in 15 min	Y
VP-4	Purge Filter	04-Jun-2019 20:10	04-Jun-2019 20:12	0.03	Aspen	1	Flat Line-No New Data in 15 min	Y